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WILDERNESS RECOMMENDATIONS

ALTURAS RESOURCE AREA

Pit River Canyon WSA and Tule Mountain WSA

FINAL ENVIRONMENTAL IMPACT STATEMENT

1987

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT
CALIFORNIA

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

IN REPLY REFER TO:
1793
(CA-930)

Dear Reader:

Enclosed is the final Environmental Impact Statement (EIS) prepared for the Alturas Resource Area of the Susanville District. The EIS includes 2 Wilderness Study Areas (WSAs) The Pit River WSA and the Tule Mountain WSA, and analyzes the impact of adding 28,525 acres to the National Wilderness Preservation System. Partial wilderness and no wilderness alternatives are also considered. All recommendations contained herein are preliminary and subject to change during administrative review. This Environmental Impact Statement was prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 and responds to the mandates of Section 603 of the Federal Land Policy and Management Act of 1976 to review public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics; determine their suitability or nonsuitability for wilderness designation; and report these suitability recommendations to the President no later than October 21, 1991.

For further information contact: District Manager, Susanville District, Bureau of Land Management, 805 Hall Street, Susanville, California 96130.

Sincerely yours,

Ed Hastey

Ed Hastey
State Director

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DEPARTMENT OF THE INTERIOR
FINAL ENVIRONMENTAL IMPACT STATEMENT
WILDERNESS RECOMMENDATIONS
FOR THE
ALTURAS RESOURCE AREA

CA-020-103 PIT RIVER CANYON WSA 11,575 ACRES

CA-020-211 TULE MOUNTAIN WSA 16,950 ACRES

Prepared By
Bureau of Land Management
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Ed Hastey
State Director, California

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ENVIRONMENTAL IMPACT STATEMENT
WILDERNESS RECOMMENDATIONS
ALTURAS RESOURCE AREA

Draft ( ) Final (X) Environmental Impact Statement

1. Type of Action: Administrative ( ) Legislative (X)

2. Abstract:

The Bureau of Land Management, Susanville District, California, has analyzed the impacts and resource tradeoffs of the proposals for two Wilderness Study Areas (WSAs).

Pit River Canyon WSA	Partial Wilderness
Tule Mountain WSA	No Wilderness/No Action

This environmental impact statement also analyzes the impacts of resource tradeoffs of an All Wilderness Alternative and a No Wilderness/No Action Alternative for the Pit River Canyon WSA, and an All Wilderness Alternative for the Tule Mountain WSA.

3. Location of Action

The wilderness study areas are located in northeastern California, in Lassen and Modoc Counties. The WSAs encompass a total of 28,525 acres of public land.

4. For Further Information Contact:

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SUMMARY

This environmental impact statement (EIS) was developed from the Alturas Resource Area Resource Management Plan (RMP) and Environmental Impact Statement. Wilderness was one of 14 issues addressed in the Alturas Resource Area RMP. This EIS is developed from material in the Alturas Resource Area RMP EIS that pertained to the Pit River Canyon WSA and the Tule Mountain WSA and the areas' suitability for inclusion in the National Wilderness Preservation System. These WSAs cover 28, 528 acres of public land. The study areas are located in northeastern California. This EIS assess the environmental consequences of managing both WSAs as wilderness or non-wilderness and of managing a portion of the Pit River Canyon WSA as wilderness.

Scoping by the public and within the BLM identified environmental issues for each WSA related to the wilderness designation.

PIT RIVER CANYON WSA - CA-020-103) 11,575 acres

The Pit River Canyon WSA (CA-020-103) contains 11,575 acres of public land in northern Lassen County, California. Redding, California is a two hour drive to the west and Reno, Nevada is a three to four hour drive to the south. The terrain is a flat to gently rolling plateau cut by a three to seven hundred foot deep U-shaped canyon containing the Pit River. Vegetation varies from ponderosa-Jeffrey pine, juniper, oak, and numerous shrubs on the canyon wall and rims to scattered juniper, sagebrush and grasses on the upper plateau lands.

The Proposed Action for the Pit River Canyon WSA is Partial Wilderness. Under this proposal 6,640 acres will be designated wilderness while the remaining 4,935 acres will continue to be managed under the existing Alturas Resource Management Plan (RMP). Two alternatives were also considered -- an All Wilderness Alternative which would designate the entire 11,575 acres as wilderness -- and a No Wilderness/No Action Alternative which would not designate any of the 11,575 acres WSA as wilderness.

Issues analyzed for the Pit River Canyon WSA include impacts on wilderness values and impacts on motorized recreation use.

TULE MOUNTAIN WSA - (CA-020-211) 16,950 acres

The Tule Mountain WSA (CA-020-211) contains 16,950 acres of public land in eastern Lassen and Modoc Counties, California. Redding, California is a three to four hour drive to the west and Reno, Nevada is a three to four hour drive to the south. The topography is a rounded mountain rising two thousand feet from the surrounding terrain. Vegetation is mostly scattered juniper in dense sagebrush with mahogany and other brush species interspersed. Small patches of fir and pine are found at the higher elevations.

The Proposed Action for the Tule Mountain WSA in No Wilderness/No Action. Under this proposal none of the 16,950 acres within the WSA will be designated wilderness. The WSA will continue to be managed under the existing Alturas Resource Management Plan (RMP). One alternative was also consider -- an All Wilderness Alternative in which all 16,950 acres within the WSA would be designated wilderness.

A scenario of management actions for the Proposed Action and alternatives for each WSA was developed. The environmental consequences were analyzed for each WSA based on the scenarios of management actions. A summary table of impacts for the Proposed Action and alternatives for each WSA is included in Chapter 2 following the discussion of management actions for each WSA.

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Chapter 1

Introduction

CHAPTER 1

INTRODUCTION

This Environmental Impact Statement (EIS) considers the possible consequences of wilderness designation, partial wilderness designation, and non-designation of two wilderness study area (WSAs) in the Alturas Resource Area, Susanville District, California.

The WSAs studied in this EIS include:

WSA No.	WSA Name	Size (acres)	County
CA-020-103	Pit River Canyon	11,575	Lassen
CA-020-211	Tule Mountain	16,950	Lassen/Modoc

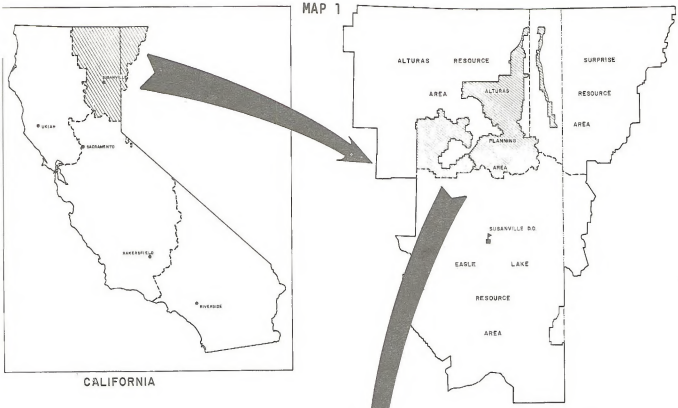
The Alturas Planning Area is located in northeastern California, in Lassen and Modoc Counties. There are two WSAs in the planning area containing a total of 28,525 acres which is 7% of the planning area. The area is approximately 20 miles north of Reno, Nevada and 300 miles northeast of Sacramento, California. The area is characterized by mountainous terrain with mixed coniferous forests interspersed with lowland valleys and sagebrush flats. It is located at the junction of the Columbia Plateau, Sierra Nevada, and Great Basin Topographic Regions (see Map 1-1).

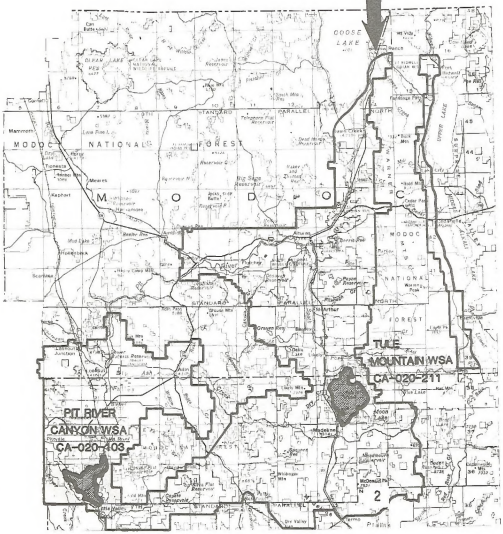
Purpose and Need for Action

The purpose of this action is to determine whether the Pit River Canyon and Tule Mountain WSA or portions of the WSAs should be designated as suitable for inclusion in the National Wilderness Preservation System. Wilderness designations of the two areas were considered in the Alturas Resource Area Resource Management Plan (RMP) and Environmental Impact Statement (EIS). This is a legislative EIS which was developed from the wilderness sections from the Resource Management Plan EIS.

This study evolves from a requirement included by Congress in Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) directing the Secretary of the Interior and the Bureau of Land Management (BLM) to review roadless areas of 5,00 acres or more having wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. In determining these wilderness values, the law directs the Bureau to use the criteria given by Congress in the Wilderness Act of 1964. In Section 2(c) of the Act, Congress states that wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

MAP 1





ALTURAS PLANNING AREA

ALTURAS PLANNING AREA

GENERAL LOCATION

Introduction

THE WILDERNESS REVIEW PROCESS AND ITS INTEGRATION WITH PLANNING

To accomplish the mandate of Section 603 of FLPMA, the BLM developed a wilderness review process containing three phases: inventory, study, and reporting.

The inventory phase of this process, initiated in 1978, involved examining the public lands to determine and locate the existence of areas containing wilderness characteristics that met the criteria established in the Wilderness Act. Areas clearly lacking wilderness characteristics were sorted out from lands that might have those characteristics. This intensive inventory was then followed by a 90-day public review period, after which final WSAs were identified.

In the Alturas Resource Area, some 28,525 acres were found to have wilderness characteristics. The Pit River Canyon WSA, CA-020-103 has 11,575 acres. The Tule Mountain WSA, CA-020-211 has 16,950 acres.

This inventory process and a general description of all of California's WSAs are given in Wilderness: Final Intensive Inventory, Public Lands Administered by BLM California Outside the California Desert Conservation Area (1979). A copy of this publication is available at any BLM office.

The second step in the review process was to integrate wilderness evaluation into the BLM Planning System (43 CFR 1600), which in the case, involved development of the Alturas Resource Area Resource Management Plan (RMP). The wilderness study criteria and quality standards containing the BLM's Wilderness Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands (47 CFR 5098-5122) were applied to each WSA.

In addition to the above referenced criteria and standards, issues for discussion were identified through public comment, and internal scoping, conflicts were analyzed and alternatives developed. See page ___ for a discussion of which alternatives were selected and why. These alternatives are the basis for analysis of environmental consequences and resource trade-offs.

Following public review of the draft environmental impact statement, the Susanville District, with State Director concurrence, prepared a final environmental impact statement and wilderness study report. These were reviewed by the BLM Director and the Secretary of the Interior, who filed this final EIS and who will make a recommendation to the President. The President has up to two years to make his final recommendation to Congress, which has sole authority to designate an area as wilderness. Until Congress decides whether or not to designate an area as wilderness, the WSAs will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review (Department of the Interior, December 1979).

SCOPING

The Council on Environmental Quality Regulations Implementing the National Environmental Policy Act (40 CFR Part 1501.7) and the BLM planning regulations (43 CFR 1610.4-1) require an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Scoping determines in depth the scope and the significant issues to be analyzed in the EIS, and identifies and eliminates from detailed study insignificant issues or issues addressed in earlier environmental reviews. Scoping thus reduces the length of the EIS and emphasizes the real alternatives and impacts.

During this process, the scope and importance of issues related to the proposed action and alternatives were identified. Information obtained during the scoping process was one of the sources used to determine which impact topics would be addressed in detail in this EIS. Additional purposes of the scoping process are to inform affected Federal, state, and local agencies and other interested parties about the proposed project, and to identify existing environmental reports and information related to the impact assessment.

The scoping process involved discussions with the public and resource specialists and managers of BLM and other relevant agencies. Written comments were received and compiled as a result of Federal Register announcements news releases, mailings, and articles about the proposal. Comments were also solicited during public meetings. In addition, the initial scoping effort has been followed by an effort to continue agency and public involvement throughout the development of this EIS. This section outlines the steps taken by BLM for the scoping and public involvement process for the EIS.

SCOPING PROCESS

The public involvement in the wilderness program began in the summer of 1978 and continues. The decision to initiate a Resource Management Plan including consideration of Wilderness Study Areas and to prepare an EIS on the Alturas Resource Area was published in the Federal Register on February 1, 1980 and filed with the California State Clearinghouse.

The scoping process for the RMP/EIS involved several phases, extending from the summer of 1978 to December 1982:

- Initial wilderness inventory and public comment period - 1978-1979.
- Intensive wilderness inventory and public comment period - 1979-1980.
- Notice of Intent to conduct resource management planning and to prepare an EIS - February, 1980.

- Preplanning analysis completed. Available for public review in April, 1980.
- Public meetings conducted on March 18 and 19, 1980 in Susanville and Alturas to identify significant issues to be addressed in the planning process.
- Issues consolidated and distributed for public comment on January 6, 1981.
- Newsletter outlining planning process published and distributed to public in August, 1981.
- Newsletter identifying planning criteria published and distributed to public in September, 1981.

A scoping letter was mailed to 93 organizations, agencies, and individuals on the Susanville District's Wilderness Mailing List. This letter explained the planning process and asked for identification of issues for the study areas.

IDENTIFICATION OF ISSUES

During the scoping process environmental issues related to whether a WSA was to be managed as wilderness or managed for multiple resource values were identified for each WSA by the BLM staff, by the public during formal scoping comment periods, and from comments on the draft EIS by the public and by Federal, State and local agencies. After the issues were identified for each WSA, they were assessed to determine if they would be selected for detailed analysis in the EIS.

The following discussions for each WSA identified the issues that are to be analyzed in detail in the EIS. In addition, the reasons are given for setting aside the remaining issues that are not included in the EIS for further consideration.

PIT RIVER CANYON WSA
(CA-020-103)

For the Pit River Canyon WSA the following issues were selected for analysis in the EIS.

- <u>Impacts on Wilderness Values</u>

  The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. The significance of the beneficial or adverse impacts is an issue for analysis in the EIS.

- Impacts on Motorized Recreation Use

  Wilderness designation would eliminate motorized recreation use. Eliminating this use could affect the availability of recreation opportunities particularly hunting and fishing, and shift use currently occurring in the WSA to adjacent lands. The impact of wilderness designation on motorized recreation use in the vicinity of the WSA is an issue for analysis in the EIS.

Additional issues were assessed to determine their significance for analysis in the EIS. However, upon further consideration they were not selected for detailed analysis. A brief discussion of each issue and the reasons for dismissing it from analysis in the EIS follows.

- Impacts of Livestock Grazing and Range Management

  Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have significant adverse impact on livestock grazing. This issue was considered but dropped because the BLM's wilderness management policy provides for the continued use of wilderness areas for livestock operations at historic levels. Although the management practices of livestock operators in the WSAs would be more closely regulated, they would continue as they did prior to wilderness designations subject to reasonable regulations. The few proposed range improvements are small scale and similar to existing improvements. The Wilderness Management policy allows these types of improvements in order to continue the existing livestock program. While this issue has been dropped from analysis, a brief description of the planned livestock program has been included because this is a significant non-conforming use which is specifically allowed by Congress.

- Impacts on Mineral/Energy Resource Development

  Development of mineral/energy resources within designated wilderness areas could be affected by wilderness management restriction. However, the potential for mineral resource is considered low and no mining claims or mineral leases exist in the WSA. Therefore this issue was dropped from further consideration.

- Impacts on Threatened or Endangered Species

  Wildlife and vegetation inventories and consultation with the U.S. Fish and Wildlife Service did not identify any threatened or endangered species in the Pit River Canyon WSA. Wintering Southern bald eagles have been known to infrequently forage in the Pit River Canyon, however, the WSA is not considered winter habitat. Therefore, this issue was dropped from further consideration.

- Impacts on Water Quality

No mineral or energy development or other surface-disturbing activities are projected for the Pit River WSA. Existing livestock grazing use (1,520 AUMs) and motorized recreation (700 visitor days) are not expected to increase. Water quality in the Pit River is seasonally during the summer months degraded by agricultural activities outside the WSA resulting in high PH levels (8.0+) prior to entering the WSA. The effects of the canyon aerate the water and feeder streams act to reduce the PH level resulting in an improvement of water as the Pit River flows through the WSA. No impacts to water quality are anticipated, therefore this issue in not analyzed in the EIS.

- Impacts on Cultural Resources

The Pit River Canyon WSA contains diverse historical and archaeological resources including habitation and food processing sites, hunting blind systems, and temporary hunting and food gathering areas. There are no projected management actions or potential surface disturbing activities that threaten these sites. Motorized recreation use is considered low and vehicle use in the WSA is designated as limited to the existing 8 miles of primitive vehicle routes. Existing motorized recreation (700 visitor days) and livestock grazing (1,520 AUMs) use levels would remain stable. Therefore impacts on cultural resources is not considered an issue for detailed analysis in the EIS.

- Impact on Native Fisheries

The WSA contains approximately 15 miles of native fisheries in the Pit River Canyon and Horse Creek. There are no management actions that would affect the quality of these fisheries since there are no surface disturbing activities projected in the vicinity of the water courses. Additionally, the low level of vehicle use within the WSA does not occur within the canyon areas because of the lack of vehicle routes and general inaccessibility due to the canyon walls and steep slopes. Therefore, the issue of impacts on native fisheries is not considered for detailed analysis in the EIS.

TULE MOUNTAIN WSA
(CA-020-211)

For the Tule Mountain WSA the following issues were selected for analysis in the EIS.

- Impacts on Wilderness Values

  The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. The significance of the beneficial or adverse impacts is an issue for analysis in the EIS.

- Impacts on Motorized Recreation Use

  Wilderness designation would eliminate motorized recreation use. Eliminating this use could affect the availability of recreation opportunities particularly hunting, and shift use currently occurring in the WSA to adjacent lands. The impact of wilderness designation on motorized recreation use in the vicinity of the WSA is an issue for analysis in the EIS.

- Impacts on Livestock Grazing and Range Improvements

  Wilderness designation could affect livestock operations by precluding a planned prescribed burn necessary for utilization of forage at increased levels. The impact of wilderness designation on livestock grazing and range improvements in the WSA is an issue for analysis in the EIS.

Additional issues were assessed to determine their significance for analysis in the EIS. However, upon further consideration they were not selected for detailed analysis. A brief discussion of each issue and the reasons for dismissing it from analysis in the EIS follows.

- Impacts on Timber Harvesting

  The Tule Mountain WSA contain 151 acres of commercial forest lands including 105 acres of white fir and jeffrey pine as well as 46 acres needing restocking to return to producing status. The total timber resource available for harvest would amount to an annual cut volume of 16 thousand board feet which is less than 3 percent of the Susanville Districts annual allowable cut. The WSA has not been included in any timber harvesting plans or projections. This amount of timber is insignificant within the region which includes the Modoc National Forest with an annual cut of 63 million board feet, and would not impact the local or regional economies. Therefore, the timber resource of the WSA in not considered a significant issue for detailed analysis in the EIS.

- Impacts on Mineral/Energy Resource Development

  Development of mineral/energy resources within designated wilderness areas could be affected by wilderness management restriction.

However, the potential for mineral resources is considered low and no mining claims exist in the WSA. Approximately 1,600 acres are under lease for oil and gas. However, these are highly speculative as potential for discovery or production is considered very low. At this time, no exploratory wells have been drilled on public lands administered by the Susanville District. Therefore this issue has been dropped form further analysis in the EIS.

- Impacts on Threatened or Endangered Species

Wildlife and vegetation inventories and consultation with the U.S. Fish and Wildlife Service did not identify any threatened or endangered species in the Tule Mountain WSA. Therefore, this issue was dropped from further consideration.

- Impacts on Water Quality

No mineral or energy development or other surface-disturbing activities are projected for the Tule Mountain WSA. Existing livestock grazing use (2,570 AUMs) would increase only slightly by 66 AUMs and motorized recreation use (1,100 visitor days) is not expected to increase. No impacts to water quality are anticipated, therefore this issue is not analyzed in the EIS.

- Impacts on Cultural Resources

The predicted cultural sensitivity for the Tule Mountain WSA is low to moderate based on a 7 percent archaeological sampling. There are no projected surface disturbing management actions and existing motorized recreation use levels (1,100 visitor days) would remain stable. Livestock grazing use is expected to increase only slightly from the current use levels (2,570 AUMs) by 66 AUMs. Therefore the impacts on cultural resources is not considered an issue for analysis in the EIS.

SELECTION OF THE PROPOSED ACTION AND DEVELOPMENT OF ALTERNATIVES

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 CFR Part 1600. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing specific factors to be considered during the planning sequence in developing suitability recommendations.

In this document, the No Action Alternative, as required by the National Environmental Protection Act, and the No Wilderness Alternative are equivalent. Both advocate continuation of management as outlined in the existing Alturas Resource Area RMP and recommendation of the WSAs as nonsuitable for wilderness.

The All Wilderness Alternative represents the maximum possible acreage that could be recommended as suitable for wilderness designation.

Partial Wilderness Alternatives can make suitable or nonsuitable recommendations ranging between the All Wilderness and No Action Alternatives. A Partial Wilderness Alternative can recommend as suitable for wilderness designation something less than the entire acreage of one WSA.

In this FEIS the Proposed Action for each of the WSAs corresponds to Preferred Alternative in the RMP/DEIS. Additionally, in the RMP/DEIS two additional no wilderness alternatives were included, one dealing with maximum resource production and the other a no action alternative reflecting management under the previous MPF. Since the Alturas Resource Area RMP has been approved, these two alternatives have been superseded by the preferred alternative from the RMP. The proposed action and alternatives for each WSA reflect the planning decisions of the RMP and continue to represent an adequate range of alternatives to be assessed in this FEIS.

The following Proposed Actions and Alternatives for each of the Pit River Canyon WSA and the Tule Mountain WSA were selected for analysis in this EIS.

PIT RIVER CANYON WSA (CA-020-103) 11,575 Acres

Proposed Action (Partial Wilderness): 6,640 Acres Recommended for Wilderness Designation
4,935 Acres Non-Wilderness

The Proposed Action for the Pit River Canyon WSA is Partial Wilderness. Within the 11,575 acres of the WSA, 6,640 acres would be recommended as suitable for wilderness designation. This includes approximately 1,860 acres within the canyon rims of Horse Creek and Pit River, and approximately 4,780 acres of upland areas outside the canyons. The area recommended as suitable for wilderness designation in the Proposed Action has been increased from the 5,800 acres identified in the Draft RMP/EIS to 6,640 acres. An additional 840 acres has been included within the upland area to include watershed divisions and other topographic features as the boundaries of the area recommended as suitable for wilderness. The recommended area contains numerous special features which enhance the wilderness values including high density raptor nesting habitat, diverse fisheries, high scenic quality, and high cultural resource values. The deep canyons of the Pit River and Horse Creek and the upland areas recommended for wilderness designation represent the most natural conditions within the WSAs as well as containing the best opportunities for solitude and primitive and unconfined recreation. There are no known mineral resources or potential for minerals development or other resource uses within the area which would be foregone by wilderness designation. There is no current motorized recreation use within the canyon areas due to the lack of vehicle routes and the virtual inaccessibility of the canyons due to the rugged topography.

The remaining 4,935 acres within the WSA would be recommended as nonsuitable for wilderness designation. This portion of the WSA does not contain the overall high wilderness values and diverse special features within the recommended portion. This area includes the two narrow projections at the extreme northern portion of the WSA which are less than one-quarter mile wide and are on either side of the Pit River Canyon which is in private ownership in this area. Due to the configuration of this portion of the WSA, opportunities for solitude and primitive and unconfined recreation are very limited. The low sage flats in the north central portion of the WSA which include a variety of range facilities and vehicle ways would also be deleted from the area recommended suitable. The northwest and southeast portions of the WSA are primarily upland areas that are narrow projections, isolated from the remainder of the WSA with limited opportunities for solitude and low naturalness values.

Two alternatives to the Proposed Action were selected for analysis in the FEIS.

All Wilderness: 11,575 acres wilderness/0 acres non-wilderness

The entire 11,575 acres within the WSA would be designated wilderness. This alternative represents the maximum possible acreage that could be designated wilderness.

No Wilderness: 0 acres wilderness/1,575 acres non-wilderness

None of the 11,575 acres within the WSA would be designated wilderness. The area would be managed for multiple use as described in part by this document and in the BLMs Alturas Resource Management Plan.

This alternative differs from the Proposed Action only in that the 6,640 acres recommended for wilderness designation in that proposal would not be designated and the uses which wilderness would restrict could occur such as motorized recreation use. The remaining 4,935 acres would be managed the same as under the Proposed Action.

TULE MOUNTAIN WSA (CA-020-211) 16,950 Acres

Proposed Action (No Wilderness/No Actions): 0 Acres Recommended for Wilderness Designation
16,950 Acres Non-Wilderness

The Proposed Action for the Tule Mountain WSA is not to designate any of the 16,950 acres as wilderness. The area will be managed primarily for livestock grazing and wildlife habitat under the existing Alturas Resource Area RMP. The WSA does not provide unique ecologic, geologic or other features of special scientific, educational or scenic value that would receive substantial benefit from wilderness designation.

One alternative to the Proposed Action was selected for analysis in the FEIS.

All Wilderness: 16,950 acres wilderness/0 acres non-wilderness

The entire 16,955 acres within the WSA would be designated wilderness. This alternative represents the maximum possible acreage that could be designated wilderness.

ALTERNATIVES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

Pit River Canyon WSA

In the RMP/DEIS two No Wilderness Alternatives were considered that were alternatives in the Alturas RMP. With the RMP completed and in effect, these two alternatives are not considered viable for continued analysis in this FEIS. One alternative the No Wilderness/No Action Alternative in the RMP/DEIS reflected continuation of management in effect prior to the RMP. This alternative has been dropped from the FEIS as the management direction of the approved RMP supersedes it. The other alternative, No Wilderness/ Maximum Production in the RMP/DEIS has also been superseded by management direction established in the approved RMP. The No Wilderness/No Action Alternative in the FEIS reflects the preferred alternative in the RMP which is the Proposed Action (Partial Wilderness). However, for the FEIS the wilderness recommendation of 6,640 has been deleted and that portion of the WSA would be managed in accordance with the management prescriptions established in the RMP for the 4,935 acres not recommended for wilderness designation.

Additional Pit River Alternative Considered but Dropped.

An alternative that would designate the Pit River Canyon within the WSA as an Area of Critical Environmental Concern (ACEC) was proposed during the public comment period. As part of the preparation of the Draft Alturas RMP, ACEC designations were considered. With respect to the Pit River Canyon, it was determined that the resource values did not meet the suitability criteria for establishing an ACEC. Though the WSA does contain "important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes" as required in the 1976 Federal Land Policy and Management Act, no special management attention is required to protect and prevent irreparable damage to these resources. These resources do not appear to be jeopardized under current management established in the Alturas RMP. Therefore, ACEC designation for the Pit River Canyon area was not considered an alternative for analysis in the EIS.

Additionally, ACEC designation was not considered as a substitute designation for wilderness

Tule Mountain WSA

In the RMP/DEIS two No Wilderness Alternatives were considered that were alternatives in the Alturas RMP. With the RMP completed and in effect, these two alternatives are not considered viable for continued analysis in this FEIS. One alternative the No Wilderness/No Action Alternative in the RMP/DEIS reflected continuation of management in effect prior to the RMP. This alternative has been dropped from this FEIS as the management direction of the approved RMP supersedes it. The other alternative, No Wilderness/Maximum Production in the RMP/DEIS has also been superseded by management direction established in the approved RMP.

The Proposed Action for the WSA described in this FEIS is a No Wilderness Alternative. Since this was also the preferred alternative in the RMP, the prescribed management direction of the RMP establishes the Proposed Action in this FEIS a No Action Alternative as well. Therefore the Proposed Action in the FEIS is No Wilderness/No Action.

Additionally, a partial wilderness alternative was considered but found to be unfeasible. Any modification of boundaries that eliminates intrusions, manageability problems, and conflicts with ORV recreation and timber resources would create a small, unmanageable unit. Therefore a partial wilderness alternative is not included for analysis in the FEIS.

Chapter 2

Proposed Actions and Alternatives

CHAPTER 2

THE PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions within the WSAs cannot be predicted with certainty, we have made projections of management actions to allow the analysis of impacts under the Proposed Action and alternatives. These projections are the basis of the impacts identified in the EIS. They represent reasonably feasible patterns of activities which could occur under the Proposed Action and alternatives analyzed.

PIT RIVER CANYON WSA
(CA-020-103)

PROPOSED ACTION (PARTICAL WILDERNESS): 6,640 Acres Recommended for Wilderness Designation
4,935 Acres Non-Wilderness

Under the Proposed Action, 6,640 acres would be designated wilderness. This portion of the WSA would be managed to preserve wilderness values and motorized recreation use would be prohibited. The remaining 4,935 acres would be managed for multiple use under the existing Alturas Resource Area RMP. Livestock grazing would continue throughout the WSA at current use levels. Approximately 740 acres of private lands would be acquired along the Canyon rim to enhance wilderness values (See map 2, p 15).

Recreation Management Actions

Under the Proposed Action 6,640 acres would be closed to motorized recreation use. Approximately 3 miles of existing vehicle routes would be closed eliminating 100 visitor days in the designated portion of the WSA. This loss of use would affect primarily deer hunters and fishermen. The existing 200 visitor days of non-motorized recreation use would slowly increase by 50 visitor days to a total of 250 visitor days per year. Non-motorized use in the WSA occurs primarily within the canyons.

The remaining 4,935 acres would be open to motorized vehicle use limited to the existing 5 miles of primitive vehicle routes. The RMP prescribes use as limited to designated routes and trails. The existing 600 visitor days of motorized recreation use would increase by 50 visitor days a result of displaced vehicle use from the designated portion of the WSA. Total motorized recreation use within the WSA is projected to reach 650 visitor days within 5 years. Recreation use within the nondesignated portion of the WSA is primarily associated with hunting use that occurs during the 2 week deer hunting season each fall. Under the Proposed Action a small trail head parking area would be developed in the nondesignated portion, northwest of Second Butte. Construction would occur over a two day period and involve surface clearance and grading of less than 1/4 acre parkingarea using a bulldozer and two pick-up trucks for support. The trail head would provide access to existing primitive vehicle routes closed to motorized recreation use as a result of wilderness designation. No new trails are planned.

Livestock Grazing Management Actions

The WSA will continue to be alloted at the current 1,520 AUMs. Three Allotment Management Plans (AMPs) are proposed for allotments within the WSA including the Muck Valley Allotment, East Beaver Creek Allotment which will include the Round Barn Allotment as a separate pasture, and the River Pasture allotment which will be part of the Bald Mountain Allotment outside the WSA. One livestock reservoir and one spring development are proposed for the Muck Valley Allotment in the central portion of the WSA north of the Pit River Canyon. The reservoir would be a pit reservoir with less than one-quarter acre of surface disturbance. Construction of the reservoir would occur over a two day period using a bulldozer with a pick-up truck. Maintenance would occur on a five year cycle with a bulldozer and pick-up truck for one day. The spring development would occur at Mud Spring and involve a spring box with a water trough and an exclosure fence around the three acre meadow area. Construction of the spring development would require two days with the use of a pick-up truck. Annual inspection and maintenance of the spring development would require one vehicle trip per year.

The seven existing pit reservoirs in the WSA would continue to be maintained on five to ten year cycle with each reservoir requiring the use of a bulldozer and pick-up truck for one day.

Wildlife Habitat Management Actions

There are no specific wildlife habitat management actions for the Pit River Canyon WSA other than the improvement of meadow habitat at Mud Spring that would occur as a result of the proposed spring development for livestock use which would include an exclosure fence around three acres of the meadow at the spring site with a water trough for livestock watering.

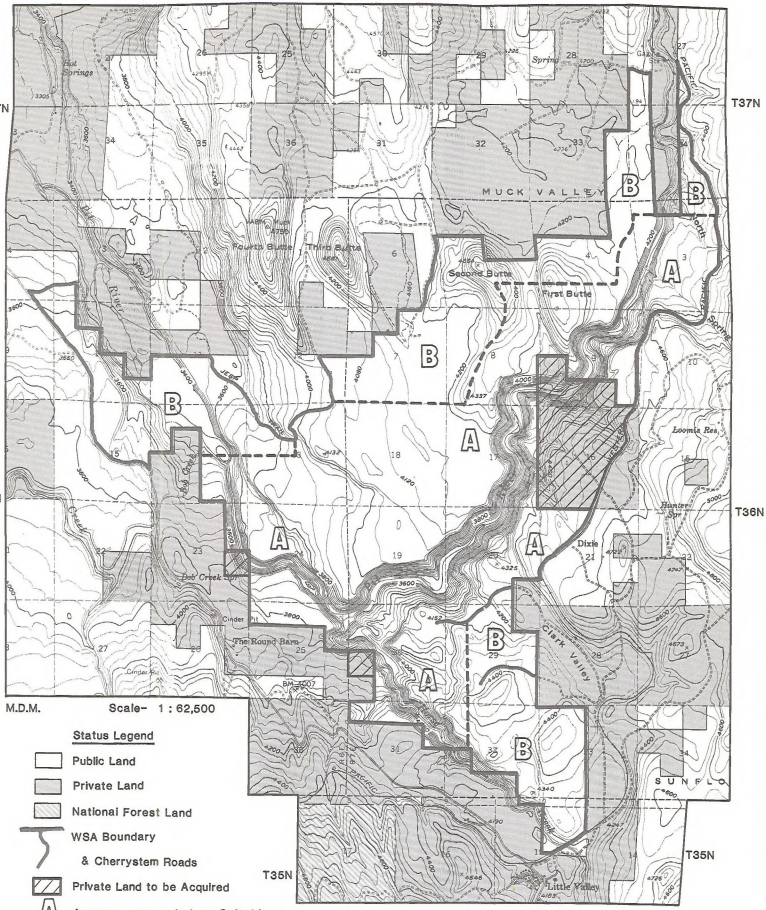
Timber Management Actions

There are no commercial forest lands in the WSA, therefore, there would be no intensive timber management. However, there are 10 acres of noncommercial forest lands in the designated portion of the WSA that would not be available for salvage timber harvest under wilderness designation. Salvage harvest generally only occurs following damage to the timber resources by insect, disease, and/or fire and, therefore, is not planned for a specific time period. However, since the noncommercial timber is scattered along the sides of the canyon with no access, no salvage harvests would be anticipated under any alternative.

Minerals/Energy Management Actions

The 6,640 acres of the WSA designated wilderness would be withdrawn from all forms of mineral entry including mineral leasing.

The remaining 4,935 acres not designated wilderness would be open to mineral entry. However, the mineral and energy potential of the WSA is considered very low. There are no existing mining claims or leases for oil and gas. No exploration or development is anticipated within the WSA.



Alternatives

Pit River Canyon Wilderness Study Area (CA-020-103)

MAP 2 : PROPOSED ACTION (PARTIAL WILDERNESS)

Cultural Resource Management Actions

Three cultural resource sites within the designated portion of the WSA would be recommended for National Register designation. For each site, two photo monitoring points would be established with photo monitoring occurring every six months to determine if any protective measures are required to maintain or enhance the sites.

Land Tenure Adjustment Actions

In order to enhance wilderness values within the designated portion of the WSA, 740 acres of private land along the Pit River Canyon would be acquired.

ALL WILDERNESS ALTERNATIVE: 11,575 Acres Recommended for Wilderness Designation
0 Acres Non-Wilderness

All 11,575 acres in the Pit River Canyon WSA would be designated as wilderness. Under this alternative motorized recreation use would be prohibited. Livestock use would continue to be allotted at current use levels. Discretionary management actions would be permitted only to preserve wilderness values. Approximately 1,300 acres of private lands would be acquired along the Canyon rim to enhance wilderness values. (See map 3, p. 18).

Recreation Management Actions

Wilderness designation would prohibit all motorized recreation use within the 11,575 acres of the WSA. Approximately 700 visitor days of motorized recreation use would be eliminated and the eight miles of existing primitive vehicle routes would be closed to recreational vehicle use. This use is primarily associated with vehicle access for hunting. Approximately 600 of visitor days would continue to use the WSA with the six miles of cherry stemmed roads as well as the boundary roads providing vehicle access for hunting. Non-motorized use in the canyon areas of the WSA along the Pit River and Horse Creek would slowly increase by 50 visitor days to a total of 250 visitor days per year. No recreation facilities presently exist or are planned within the WSA. However, two sites would be developed outside the WSA under the All Wilderness Alternative.

Livestock Grazing Management Actions

Livestock grazing management actions for the All Wilderness Alternative would be the same as those described under the Proposed Action.

Wildlife Habitat Management Actions

Wildlife Habitat Management actions for the All Wilderness Alternative would be the same as described under the Proposed Action.

Timber Management Actions

Timber management actions would be the same for the All Wilderness Alternative as described under the Proposed Action.

Energy/Minerals Management Actions

All 11,575 acres within the WSA would be closed to all forms of mineral entry. Since there are no existing mining claims or mineral leases and the mineral and energy potential is considered very low, it is not projected a mineral discovery would be made prior to wilderness designation. Therefore, valid existing rights would not be established and no future mining activities would occur.

Cultural Resource Management Actions

Cultural resource management under the All Wilderness Alternative would be the same as those described under the Proposed Action.

Land Tenure Adjustment Actions

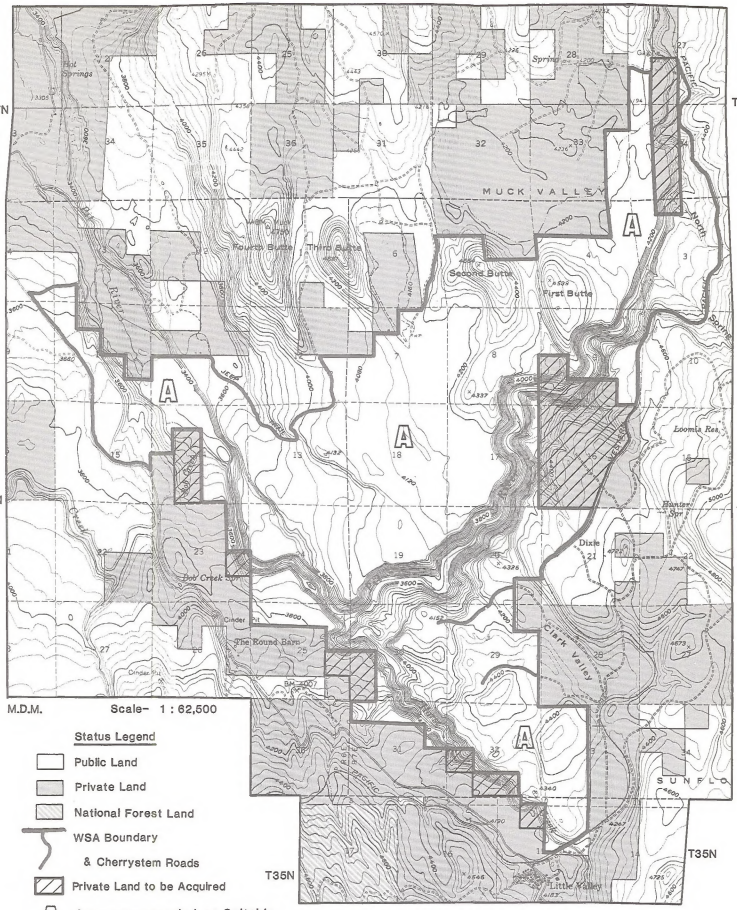
In order to enhance wilderness values, 1,300 acres of private lands would be acquired along the canyon portions of the WSA.

NO WILDERNESS/NO ACTION ALTERNATIVE: 0 Acres Recommended for Wilderness Designation
11,575 Acres Non-Wilderness

None of the 11,575 acres in the Pit River Canyon WSA would be designated as wilderness. The area would be managed for multiple use under the guidance of the Alturas Resource Area RMP. Motorized recreation use would continue as designated under the RMP as limited to existing roads and trails with use restricted within the Canyon. Livestock grazing would continue to be allotted at existing levels.

Recreation Management Actions

The entire 11,575 acres within the WSA would be open to motorized recreation use as prescribed in the RMP as limited to designated routes and trails. The eight miles of existing primitive vehicle routes would remain open with the current 700 visitor days of motorized recreation use remaining stable. The existing vehicle use is predominantly associated with hunting occurring during a two week season every October. While the entire WSA would be open to use on the existing routes and trails, vehicle use would be limited to the upland areas since there are no existing routes or vehicle access within the canyons along the Pit River and Horse Creek. Non-motorized use is anticipated to remain below 200 visitor days. No recreation facilities exist and none are planned due to the overall low level of use and low demand for recreation facilities.



Alternatives

Pit River Canyon Wilderness Study Area (CA-020-103)

MAP 3 : ALL WILDERNESS ALTERNATIVE

Livestock Grazing Management Actions

Livestock grazing management actions for the No Wilderness/No Action Alternative would be the same as described under the Proposed Action.

Wildlife Habitat Management Actions

Wildlife habitat management actions for the No Wilderness/No Action Alternative would be the same as described under the Proposed Action.

Timber Management Actions

Ten acres of noncommercial timber land in T. 36 N., R. 7 E., Section 30 would be available for salvage harvest should the timber resources be damaged by insects, disease, and/or fire and an evaluated harvest potential can be determined. However, since the noncommercial timber is scattered along the sides of the canyon with no access, no salvage harvests are anticipated.

Minerals/Energy Management Actions

The entire 11,575 acres within the WSA would be open to mineral and energy exploration and development. However, since the WSA is considered to have a very low mineral potential and there are no mining claims or leases for oil and gas, no exploration or development is anticipated.

Cultural Resource Management Actions

Cultural resources management actions would be the same as those described under the Proposed Action.

Land Tenure Adjustment Actions

Under the No Wilderness/No Action Alternative, 740 acres of private land would be acquired to enhance and protect the Pit River Canyon as described under the Proposed Action.

Comparison of Impacts of the Proposed Action
and the Alternatives for
the Pit River Canyon WSA

Issue-Related Resource	Proposed Action (Partial Wilderness	All Wilderness Alternative	No wilderness/ No Action Alternative
Wilderness Values	Wilderness designation of 6,640 acres within the Pit River Canyon WSA would result in slight positive benefits to the wilderness values particularly naturalness and solitude due to the prohibition of motorized recreation use (100 visitor days). Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest rotation grazing system to prevent overuse of pastures. The perception of naturalness would be impaired on a total of 200 acres from construction of a pit reservoir and a spring development. However, impacts would be highly localized and would not result in any significant impacts to solitude in relation to the entire WSA. Acquisition of 740 acres along the Pit Canyon and rim area would result in a slight benefit to naturalness and primitive unconfined recreation as well as special features such as raptor nesting habitat and scenic quality.	Wilderness designation would have a slight positive benefit on wilderness values particularly in the upland areas where motorized recreation use has deminished the perception of naturalness and sense of solitude. Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest/rotation grazing system to prevent overuse of 1,300 acres along the canyon areas would benefit naturalness and primitive and unconfined recreation as well as special features including raptor nesting sites and scenic quality. Additionally, long-term protection from unanticipated future actions that could result in potential adverse impacts would be provided.	Continued motorized recreation use and livestock grazing would only slightly diminish the wilderness values primarily naturalness and solitude. Construction and maintenance of a proposed livestock project as well as maintenance of existing projects would result in highly localized minor impacts, with the precption of naturalness and the sense of solitude impaired on a total of 200 acres. Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest/rotation grazing system to prevent overuse of pastures. Opportunities for primitive and unconfined recreation would be slightly impaired in the upland areas, although the opportunities in the canyon areas would be retained. Acquisition of 740 acres along the Pit River Canyon would slightly benefit special features.

Issue-Related Resource	Proposed Action (Partial Wilderness	All Wilderness Alternative	No wilderness/ No Action Alternative
Wilderness Values (continued)	In the nondesignated portion of the WSA, wilderness values would be only slightly diminished due to the continued and projected motorized recreation use (650 visitor days) as well as continued maintenance of existing livestock reservoirs.		
Motorized Recreation Use	There would be only negligible impacts on motorized recreation use as three miles of primitive vehicle routes would be closed with 100 visitor days foregone within the 6,440 acres designated wilderness. There are other opportunities outside the WSA for motorized recreation use that are similar as well as continued access opportunities resulting from cherry stemmed roads, boundary roads and existing primitive vehicle routes within the nondesignated portion of the WSA where use is projected at 650 visitor days.	The entire WSA would be closed to motorized recreation use, eliminating 700 visitor days of vehicle use. However, the majority of this use is associated with vehicle access for hunting which would continue to use boundary roads and existing cherry stem roads. Only minor adverse impacts are anticipated due to the overall low level of use.	There would be no impacts on motorized recreation use in the WSA. The current 700 visitor days would remain stable with the existing eight miles of primitive vehicle routes open for use.

TULE MOUNTAIN WSA (CA-020-211)

PROPOSED ACTION (NO WILDERNESS/NO ACTION): 0 Acres Recommended for Wilderness Designation
16,950 Acres Non-wilderness

Under the Proposed Action none of the 16,950 acres within the Tule Mountain WSA would be designated as wilderness. The area would be managed for multiple use under the guidance of the Alturas Resource RMP. Motorized recreation use would continue. Prescribed burning would be used to maintain the natural condition of the fire dependent ecosystem. Livestock grazing would continue at current use levels (see Map 4 p. 25).

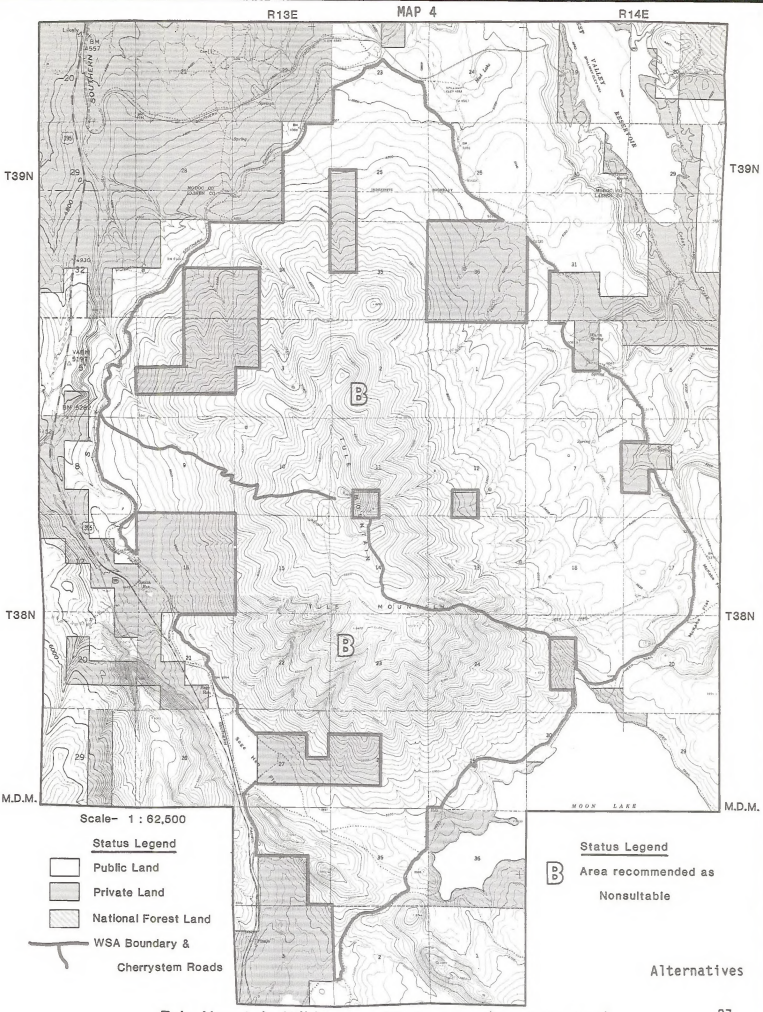
Recreation Management Actions

All motorized recreation use would continue as the 16,950 acres of the WSA would remain open for vehicle use as designated in the RMP. This includes approximately 20 miles of primitive vehicle routes that exist within the WSA as well as the six miles of cherry stemmed roads. Use within the WSA is primarily deer hunting which occurs in October during a two week hunting season. Motorized recreation use primarily supports hunting with very little use occurring throughout the remainder of the year. The current motorized recreation use for the WSA is 1,100 visitor days per year and 13 anticipated to remain stable. Only 50 visitor days are attributed to non-motorized recreation use.

Livestock Grazing Management Actions

Under the Proposed Action, livestock use within the WSA would continue to be alloted at the current 2,570 AUMs within portions of the Tule Lake and Warm Springs Allotments. Additionally, a prescribed burn within a 3,000 acre target area on the upper slopes of Tule Mountain would increase forage production by 66 AUMs to increase livestock use to a total of 2,636 AUMs within the WSA. The burn would affect 2,000 acres of sagebrush and allow desirable grass species to establish dominance. The burn would occur over a three day period, utilizing a helitorch with three support vehicles including a pumper and would be limited to the existing vehicle routes except for cross-country travel in the event of an emergency or necessary fire suppression activities. No other livestock facilities or improvements are proposed within the WSA.

There are 19 existing pit reservoirs within the WSA that would continue required maintenance on a five to ten year cycle. Maintenance of each reservoir would require one day of bulldozer use as well as a pick-up truck for support. The 4 1/2 miles of fence within the WSA would require annual inspection and maintenance prior to the season of use. Inspection and maintenance would be done on horseback and require only one day. Major maintenance would occur on approximately a 10 year cycle requiring the use of a pick-up truck for two days to supply materials.



Alternatives

Tule Mountain Wilderness Study Area (CA-020-211)

MAP 4 : PROPOSED ACTION (NO WILDERNESS / NO ACTION)

Wildlife Habitat Management Actions

Underburning in decadent browse on 1,500 acres was identified within the Tule Mountain WSA in the Alturas RMP as a wildlife habitat management action to improve browse condition of deer range. However, based on research and recent experience burning in this Great Basin vegetative community has not proven effective and can result in a potential detrimental effect. Therefore, this management action will not be implemented within the Tule Mountain WSA. No other management actions for wildlife habitat improvement are proposed for the WSA.

Timber Management Actions

Although the 151 acres of commercial timber land within the WSA is not included in any current or projected timber harvest plans, or it would be available for intensive management under the Proposed Action.

The 46 acres of commercial timber land requiring replanting to return to producing status would be restocked with white fir and Jeffrey pine seedlings.

A pre-commercial thinning would be done on the 105 acres of overstocked white fir and Jeffrey pine. Future timber harvest would consist of selective commercial thinning occurring on a 20 to 30 year cycle with a projected harvest of 200 Mbf. Less than one mile of road would be constructed to accommodate timber harvesting. Timber harvesting activities would occur over a two month period within the projected harvest cycle.

Additionally, 900 acres of juniper on the lower slopes of Tule Mountain along the eastern boundary of the WSA would be available and designated for fuelwood harvest. The area has not been a designated fuelwood cutting area in the past. It is projected that 50 cords of juniper per year would be available for harvesting under noncommercial permits. Fuelwood harvest would amount to less than 50 vehicle trips per year occurring along and within one-half mile of the boundary road.

Mineral/Energy Management Actions

The entire 16,950 acres within the WSA would be open to all forms of mineral entry including mineral leasing. However, the potential for mineral and energy resources is considered very low. There are no mining claims within the WSA. While there are 1,600 acres under lease for oil and gas these are considered to be highly speculative. The potential for discovery or production of oil and gas resources is very low. Therefore, while exploration and development of mineral and energy resources would be permitted, there is no mineral or energy activity anticipated within a 15-20 year planning projection.

Decorative stone could potentially be sold and collected with the WSA. However, the only source is on top of Tule Mountain which has poor

accessibility due to steep rugged terrain and the primitive nature of the existing access. Decorative stone is readily available outside the WSA in more accessible locations. Therefore, no sales and collection of decorative building stone have occurred within the WSA and none are projected.

ALL WILDERNESS ALTERNATIVE: 16,950 Acres Recommended for Wilderness Designation
0 Acres Non-wilderness

All 16,950 acres in the Tule Mountain WSA would be designated a wilderness. Under this alternative motorized recreation use and timber harvesting would be prohibited. Livestock use would continue at current use levels. Discretionary management actions would be permitted only preserve wilderness values. Prescribed burning would be permitted to maintain the natural condition of a fire dependent ecosystem.

Recreation Management Actions

Under the All Wilderness the entire 16,950 acres of the WSA would be closed to motorized recreation use including 20 miles of existing primitive vehicle routes. Wilderness designation would eliminate 1,100 days of motorized vehicle use of which 1,000 visitor days are related to vehicle access for deer hunting. Non-motorized recreation is anticipated to increase from the current 50 visitor days to 650 visitor days as hunters continue to utilize boundary roads and cherry-stemmed roads for foot access to the WSA.

Livestock Grazing Management Actions

Under the All Wilderness Alternative the WSA would continue to be alloted at 2,570 AUMs. A proposed prescribed burn would not be permitted and livestock grazing use levels would not increase. There are no other proposed livestock grazing projects under this alternative.

Maintenance of the existing 19 livestock reservoirs and 4 1/2 miles of fence would continue as described under the Proposed Action.

Wildlife Habitat Management Actions

As described under the Proposed Action there are no wildlife habitat management actions for the Tule Mountain WSA.

Timber Management Actions

Intensive timber management would not be permitted under the All Wilderness Alternative. Replanting pre-commercial thinning and selective commercial thinning within the 151 acres of commercial timber land would not occur.

Fuelwood harvesting would not be allowed within the WSA.

Mineral/Energy Management Actions

The entire 16,950 acres within the WSA would be closed to all forms of mineral entry including mineral leasing. The existing oil and gas leases would not be developed based on the very low potential for discovery or production. Additionally, no exploration for oil and gas has occurred on public lands within the Susanville District. There are no mining claims in the WSA and based on the very low potential for mineral resources in the WSA it is not anticipated that any mineral discovery would occur prior to wilderness designation that would establish valid existing rights. Therefore, no mineral or energy activity would occur under wilderness designation.

Comparison of Impacts of the Proposed Action
and the Alternatives for
the Tule Mountain WSA

Issue-Related Resource	Proposed Action (All Wilderness/No Action)	All Wilderness Alternative
Wilderness Values	There would be slight to minor impacts on naturalness, solitude, and primitive and unconfined recreation throughout the WSA except for short-term and localized adverse impacts. Continued motorized recreation use (1,100 visitor days) would result in a minor impact to naturalness as well as short-term moderate impact to solitude during the two week deer hunting season. The prescribed burn would have a minor short-term impact on naturalness within the 2,000 acre burn area with minor impacts to solitude over the three day operation. Timber harvesting would impair naturalness within a 151 acre and disrupt solitude for two months every 20 to 30 years. Other activities including fuelwood harvesting and maintenance of existing livestock facilities would result in negligible to minor localized impacts particularly to solitude.	Wilderness designation would have a slight benefit on wilderness values. As a result of precluding existing motorized recreation use as well as the projected prescribed burn for increased livestock use, timber harvesting, and fuelwood cutting wilderness values would be retained and slightly enhanced, particularly naturalness and solitude. Additionally, long-term protection from unanticipated future actions that could result in potential adverse impacts would be provided.
Motorized Recreation Use	There would be no impact on motorized recreation use in the WSA. The current 1,100 days of motorized recreation use would remain stable with the entire WSA open to motorized vehicle use including 20 miles of primitive vehicle routes.	Motorized recreation use totalling 1,000 visitor days would be foregone. This would result in a minor impact as the WSA would continue to have vehicle access, particularly for hunting, available around the perimeter from boundary roads and from six miles of cherry stemmed roads which penetrate the central portion of the WSA.

Issue-Related Resource	Proposed Action (All Wilderness/No Action)	All Wilderness Alternative
Livestock Grazing and Range Improvements	There would be no impact on livestock grazing and range improvements. A 2,000 acre prescribed burn would be permitted resulting in an increase of 66 AUMs for a projected total of 2,636 AUMs.	An increase of 66 AUMs, or less than three percent of the current 2,570 AUMs allotted within the WSA would be foregone as a result of precluding a proposed 2,000 acre prescribed burn. This would result in a slight impact on livestock grazing and range improvements.

Chapter 3

Affected Environment

CHAPTER 3

THE AFFECTED ENVIRONMENT

This chapter includes a brief description of each WSA and the resources that could be affected by the management actions of the Proposed Action and the alternatives.

More detailed descriptions of the resources in the study area and the regional socioeconomic conditions may be found in the planning documents for the area. Copies of these documents may be reviewed in the Susanville District Office and the Alturas Resource Area Office.

PIT RIVER CANYON WSA
(CA-020-103)

The predominant feature of the WSA is approximately eleven miles of the Pit River and associated canyon which dissects the area from the extreme northeast corner (elev. 3,900) in an open U-shaped configuration through the center of the WSA and continuing downstream through the extreme northwest corner (elev. 3,520). The canyon averages 300 to 400 feet in depth with extreme depths to 750 feet. Approximately four miles of Horse Creek are included between Little Valley (elev. 4,150), at the southern most end of the WSA, and its mouth at the southern most point along the course of the Pit River (elev. 3,530). From near ground level at Little Valley, Horse Creek reaches a canyon depth of approximately 450 feet at its mouth. Topography of both canyons are similar with rough outcroppings, talus slopes, rimrock, and steep vertical cliffs. The rugged water courses of these drainages encompass approximately 2,000 acres. The remainder of the WSA includes contiguous public lands adjacent to Pit River and Horse Creek. Approximately 5,300 acres is contained within the U-shape of Pit River. It includes two buttes to elevation 4,664 in the northeast, with rolling annual grassland, rimrocks, and lava outcrops. A second block of land containing approximately 2,300 acres lies north of Little Valley between Horse Creek and Pit River. The rolling topography in this area is cut with numerous intermittent drainages. Vegetation with the canyon is typically riparian with willows and shrubs at the waters edge and juniper black oak and ponderosa and Jeffrey pine within the canyon. The buttes in the northeast portion of the WSA are covered with dense stands of juniper with sage and grass openings. The remaining upland areas are predominantly grasses and forbes with scattered juniper (see Map 5, p. 37).

The WSA generally appears to have been affected primarily by the forces of nature. The canyons of the Pit River and Horse Creek are essentially pristine in appearance.

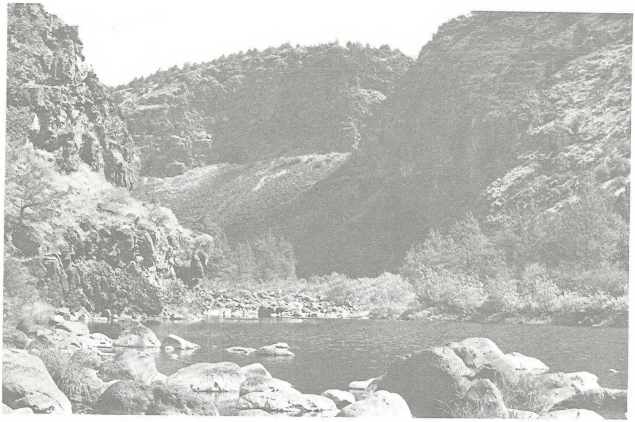


Photo 1. Pit River Canyon south of First Butte.

Photo 2. Upland area of the Pit River Canyon WSA near Second Butte.

WILDERNESS VALUES

- Naturalness

The WSA is mostly free of the imprints of man. However, the imprints of man's activities on the landscape are evident in two major portions of the WSA.

In the Muck Valley area, a way forming the WSA boundary west of Second Butte enters the WSA and splits into three ways totalling 3 1/2 miles. Where these ways cross open, low sage flats, they are readily visible and reduce the naturalness. Further into the WSA the ways cross lava habitats with medusahead grass cover which annually obscures these impacts. There are also four small pit reservoirs with a surface area of less than 1/4 acre each.

South of Fourth Butte in the north central portion of the WSA a way continues into the WSA for approximately 1 mile. The way is well screened by dense juniper and other vegetation and does not reduce the natural quality.

The second major area is Clark Valley, where two cherry stem roads recognized in the wilderness inventory penetrate the WSA from Clark Valley and split into approximately 3 miles of ways providing access to four reservoirs. There are also three small pit reservoirs in Clark Valley with a surface area of less than one-quarter acre each. Hilly topography with scattered oak and juniper vegetative cover tend to screen these impacts in the context of the overall naturalness of the WSA; however, the impacts are frequent and reduce natural quality in this small area.

During the wilderness inventory, boundary adjustments were made to exclude areas where man's impact overrides the basic natural character of the land, as described in Section 2(c) of the Wilderness Act of 1964. Lands retained within the WSA boundary do meet this minimum basic standard.

- Solitude

Though not immense when compared to other WSA's, the dramatic topographic variation from buttes to rugged canyon topography provide outstanding opportunities for a visitor to avoid sights, sounds, and evidence of other visitors. Though long vistas are available from canyon rims, isolation from that viewshed is available around the next bend in the water course. Along Horse Creek solitude is provided by the extremely dense riparian vegetation.

Solitude is readily available throughout the WSA, with three exceptions. A portion of the eastern boundary is an active railroad line. The railroad is readily visible from higher elevations in Muck Valley and from within the canyon from First Butte north. The railroad is 500 to 600 feet above the canyon floor. Daily train traffic can be expected.

Little Valley Road, a paved county road, forms the western boundary along the far western end of the WSA. WSA lands adjacent to the road are annual grasslands with scattered juniper. The road provides access to the Little Valley Lumber Mill, as well as public lands within the WSA.

Dryland alfalfa farming occurs immediately adjacent to the narrow finger of WSA on the west side of the river. As this portion of the WSA consists of a medusahead and low sage flat, the agricultural activities are apparent in this area.

- Primitive and Unconfined Recreation

Outstanding opportunities for primitive and unconfined types of recreation are available throughout almost the entire WSA. Fishing, hunting, wildlife observation, hiking, and climbing are a few of the potential activities available.

Opportunities for primitive and unconfined types of recreation are restricted at the extreme upstream and downstream ends of Pit River, and the upstream end of Horse Creek by boundary configurations which constrict the WSA into narrow fingers of wilderness, and by private lands which intersect these water courses. Visitors (e.g. hikers) traveling in the area would be forced into narrow corridors immediately adjacent to private lands where indiscriminate private development may occur. The Pit River in these areas offers limited topographic features conducive to recreational activities. Within the body of the WSA boundary, private lands intersect the water course of Pit River at two locations and of Horse Creek at four locations.

- Special Features

The special features of the WSA includes the Pit River Canyon which provides a high density of raptor nesting sites, primarily golden eagles, prairie falcons, red-tailed hawks, and American kestrels. The Pit River and Horse Creek support thriving native fisheries with a diversity of species. The WSA has high scenic quality with topographic variety ranging from the canyons with flowing water to the buttes, grass flats, and rolling hills of the upland area. The WSA also contains National Register quality, historical and archeological sites.

RECREATION

The primary recreation use within the WSA is hunting, predominantly deer hunting (500 visitor days) with a small amount of antelope (100 visitor days) and small game (100 visitor days) hunting. Hunting use is almost entirely supported by vehicle access. The total motorized recreation use within the WSA is 700 visitor days. Vehicle use within the WSA is prescribed in the RMP as limited to designated routes and trails. There are eight miles of existing primitive vehicle routes within the WSA with

an additional 1 1/2 miles of cherry stemmed roads. Non-motorized recreation is mostly hiking, sightseeing, and fishing within the canyon areas. A total of 200 visitor days of non-motorized use is currently occurring. Projected recreation use within the WSA would remain generally stable with a slight increase in non-motorized use as a result of increased interest due to wilderness designation. There is no known current or past white-water use of the Pit River through the WSA due primarily to its inaccessibility and highly variable water flows. Due to the low use and low demand, no recreation facilities currently exist and none are projected.

SCENIC QUALITY

The area falls within an overall Scenic Quality Class A rating.

The WSA provides topographic variety with buttes, grass flats, rolling hills, and rugged canyons with flowing water. The canyon walls have a variety of features including cliffs, talus slopes, and rock outcrops. Vegetative types exhibit great diversity including grasslands, riparian, and woodland types.

WILDLIFE

The WSA contains approximately 15 miles of stream including Pit River and Horse Creek. Both of these streams support thriving native fisheries. Game fish include rainbow trout and largemouth bass in Horse Creek, and channel catfish and largemouth bass in Pit River. Nongame fish such as squawfish, hardhead, Sacramento sucker, and bullhead are predominant in Pit River.

Within Pit River Canyon, high cliff walls provide ideal habitat for nesting raptors. Golden eagles, prairie falcons, red-tailed hawks, and American kestrels nest in high densities throughout the canyon. Ospreys utilize both Horse Creek and Pit River for foraging activities although no nest sites are known. Swainson's Hawks a State protected species, may utilize nest sites outside the WSA in Muck Valley. However, no nesting sites exist in the WSA and there has been no verification that the Swainson's Hawk utilizes the WSA for foraging. Primary raptor nesting areas are shown on Map 3 on Page 3-6

Wintering bald eagles have been known to infrequently forage in the Pit River Canyon. However, this is not considered a wintering area with regular use.

Mule deer utilize all areas west of Second Butte as winter range.

High elevation portions of the management area north of Pit River Canyon serve as antelope summer range. Approximately five square miles of winter range also occur in this area. An antelope kidding ground has been identified by the California Department of Fish and Game in the extreme northeast corner of the WSA.

Mud spring in T. 36 N., R. 6 E., S. 24; is suffering from cattle trampling. To maintain a flow from the spring, a cattle exclosure is being considered.

VEGETATION

The Pit River Canyon WSA supports a diverse range of vegetation from the riparian habitat along the canyon bottoms to the open sage flats in the upland areas. Canyon wall and rim vegetation consists primarily of ponderosa and Jeffery pine, juniper, oak, mahogany, numerous shrubs and grasses, willow, and a variety of other aquatic and semi-aquatic plants. Vegetation in the upland areas north of the Pit River consists of medusa-head grass, occasional dense stands of juniper, with sage, oak, ceanothus, bitterbrush, and curl leaf mahongany. The Little Valley area between Horse Creek and Pit River Canyons is covered with dense oak, juniper, and numerous shrub species.

There are no sensitive plants species or habitats known to exist within the WSA.

CULTURAL RESOURCES

The Pit River Canyon WSA contains diverse historical and archaeological sites. Some of the larger sites are located jointly on BLM and private lands.

The sites include large habitation and food processing sites, hunting blind systems, and temporary hunting and food gathering areas. At a few sites, historic buildings have been built over house pits.

This WSA is a division of territories between two groups: the Achomawi to the north and Atsugewi in the south.

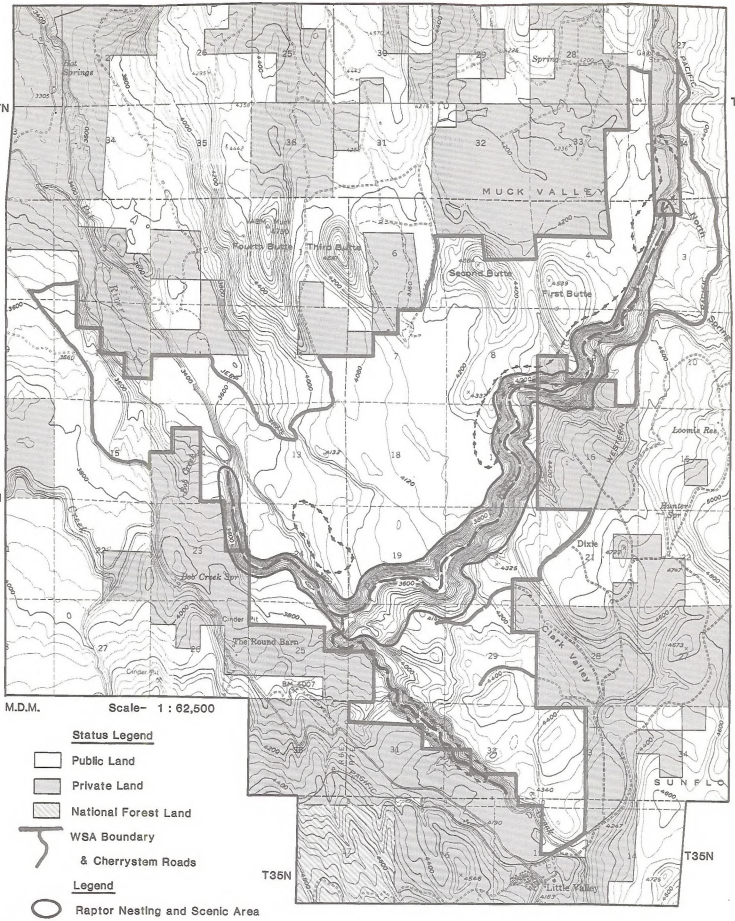
MINERALS/ENERGY DEVELOPMENT

The Pit River WSA is underlain by Pliocene (2 million to 5 million years old) and Pleistocene (10,000 to 1 million years old) basalt and quaternary (1.5 million years to present) alluvium. There are no known occurrences of mineral resources in this WSA. A preliminary study by the U.S. Bureau of Mines of the WSA did not reveal any potential mineral resources. There are no existing mining claims or oil and gas leases within the WSA. Additionally, there is no evidence of previous mining activity within the WSA. A preliminary inventory by BLM geologists indicate only very low potential for the occurrence of mineral or energy resource in the WSA.

LIVESTOCK GRAZING

The WSA contains portions of five grazing allotments with 1,520 AUMs currently allotted in the WSA. These are summarized below.

MAP 5



M.D.M. Scale- 1 : 62,500

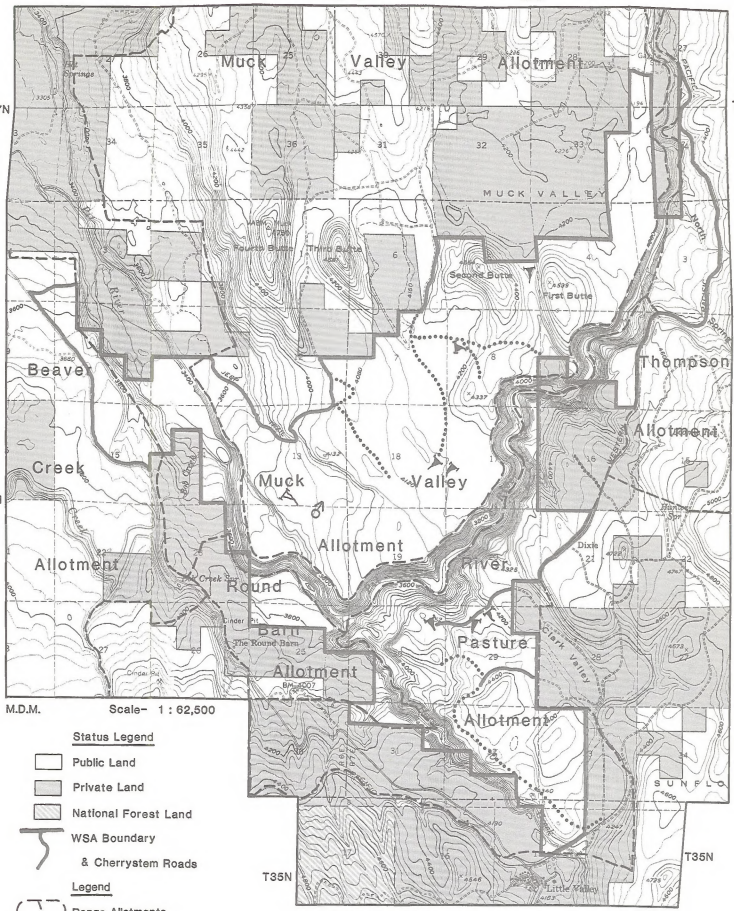
Status Legend

- Public Land
- Private Land
- National Forest Land
- WSA Boundary & Cherrystem Roads

Legend

- Raptor Nesting and Scenic Area
- Fishery Area
- Archeology Area

MAP 5 : EXISTING RESOURCES



Status Legend

- Public Land
- Private Land
- National Forest Land
- WSA Boundary & Cherrystem Roads

Legend

- Range Allotments
- Ways (Unimproved Access)

Range Improvements

- Proposed Spring Development
- Reservoir
- Proposed Reservoir

Allotment	Total Acres	Percent of Acres in WSA	Total Active AUMs in WSA	Permittees
Muck Valley	6,335	77	1,050	1
Thompson	6,802	8	50	1
River Pasture	5,474	54	285	1
E. Beaver Creek	3,979	15	110	1
Round Barn	1,740	25	0 (25 Licensed)	1

No allotment management plans (AMPs) are currently in effect for any of these allotments. Three AMPs are planned which will affect these allotments. One AMP will be developed for the Muck Valley allotment, one for the Bald Mountain allotment (not in the WSA) which will incorporate River Pasture as a separate pasture under a grazing system, and one for East Beaver Creek which may incorporate Round Barn allotment as a separate pasture under a grazing system. There are seven pit-type livestock reservoirs in the WSA to manage livestock distribution. One spring development and one livestock reservoir are planned for the Muck Valley Allotment in the central portion of the WSA. These developments, shown on Map 3-1, have been built by BLM, by the permittees, or by both through cooperative agreements. New range improvements resulting from the implementation of AMPs will be allowed only if they enhance wilderness values by better protecting the rangeland in its natural condition, and if the proposed development will not impair wilderness characteristics (see Map 6, p. 38).

TIMBER

No commercial forest land base exists within this WSA.

Ten acres of noncommercial low site forest land are located within the WSA (T.36N., R.7E., Section 30). These lands are not in the commercial forest land base and therefore are not identified to receive intensive forest management practices. Generally, low site forest land is evaluated for salvage potential following damage of timber resources by insect, disease and/or fire.

TULE MOUNTAIN WSA
(CA-020-211)

The Tule Mountain WSA (CA-020-211) is entirely composed of peaks, slopes, and drainages associated with Tule Mountain. Elevation ranges from 4,900' to 7,098'. The unit is diamond-shaped and roughly 10 miles long and 6 miles wide. Drainages formed by intermittent streams thread the WSA, with a sage brush-juniper community dominant throughout. Ponderosa pine and mountain mohogany are found within various draws. The eastern half of the WSA has heavy juniper tree cover. Tule Mountain forms the prominent landmark of the WSA, and is viewed for miles within the surrounding areas (see Map 7, p. 47).

Photo 3. Lower slopes of Tule Mountain WSA.

Photo 4. Top of Tule Mountain from the south.

WILDERNESS VALUES

- Naturalness

Man's influence has not significantly degraded the area's natural condition. However, man's activities are evident throughout the WSA including 20 miles of primitive vehicle routes and 24 livestock reservoirs.

All of the reservoirs were built and are maintained periodically by tracked caterpillar-type equipment. The routes traversed by this equipment from reservoir to reservoir are visible from the original construction and subsequent maintenance. Additional impacts include approximately two miles of hand-cut fire line and approximately four miles of fenceline on the west side of the mountain. When appraised individually in the context of the whole WSA, each of these impacts is somewhat absorbed by vegetative and topographic screening.

Two cherry stem roads identified during the wilderness inventory penetrate the WSA from the east and west boundaries and end within one mile of each other near the center of the unit. Each of these roads is approximately three miles in length. Although they are technically outside the WSA, they, in effect, nearly bisect the unit. An additional 20 miles of ways lead to 17 of 24 reservoirs found in the unit. Topographic and vegetative screening absorb enough of these impacts that, on the whole, the area retains its natural character to the extent defined in Section 2(c) of the Wilderness Act of 1964.

- Solitude

The size of the WSA lends itself to achieving a feeling of solitude. Topographic and vegetative screening serve to enhance the ability of a visitor to find seclusion from other visitors to the area. With the exception of infrequent maintenance of range improvements and off-road vehicle use on the numerous ways, there are no activities within the WSA which would detract from the solitude a visitor would experience. Vehicle use occurs on the cherry stem roads. The viewshed opens toward the South Warner Mountains to the east, toward the distant towns of Likely and Madeline to the north and south, and toward the Southern Pacific Railroad, U.S. 395, and Likely Mountain to the west.

- Primitive and Unconfined Recreation

Large size, topography, and vegetation provide opportunities for primitive and unconfined types of recreation such as hiking, horseback travel, hunting; etc. The area does not possess any unique natural features, diverse or challenging terrain to provide outstand- ing recreation opportunities.

- Special Features

The WSA contains no identified ecological, geological, or other special features.

RECREATION

Very little recreation use occurs within the Tule Mountain WSA with the exception of deer hunting during the two week deer hunting season in October. During this period, motorhomes and four-wheel drive vehicles explore seemingly inaccessible areas using the six miles of cherry stemmed roads and the 20 miles of primitive vehicle routes throughout the WSA. This is an intensive, traditional use with the same people returning year after year to hunt the area. Approximately 1,100 visitor days per year are associated with motorized recreation use with 1,000 of these visitor days attributed to vehicle access for deer hunting. The remaining 100 visitor days of motorized recreation use result from small game hunting and sightseeing. Motorized recreation use is anticipated to remain stable and is not anticipated to increase within the foreseeable future. Very little non-motorized recreation use occurs within the WSA and is anticipated to total less than 50 visitor days. This non-motorized use primarily originates from the Moon Lake area along the southern boundary of the WSA.

SCENIC QUALITY

The Tule Mountain WSA falls within an overall Scenic Quality Class B rating.

The WSA is centered around Tule Mountain (7,098 ft.) which rises approximately 2,900 feet from the WSA boundary. The mountain is covered with a variety of vegetation is is covered by a number of side drainages. The lower slopes of the mountain is generally a mixture of big sagebrush and western juniper, with juniper predominant in the drainages and over most of the east side of the mountain. The midslopes of the mountain are more open with big sagebrush interspersed with patches of mountain mahogany. The upper slopes are covered with a more dense covering of conifers including white fir and Jeffrey pine.

WILDLIFE

Mule deer are the only significant wildlife resource utilizing the WSA. Deer utilize the area as summer range only. These are generally deer associated with the Warner Mountain herd though some may winter with deer from the East Lassen herd in western Nevada. Some summer use by antelope from the Likely Tables sub herd occurs on lower slopes particularly around Moon Lake. Raptor species include red-tailed hawks, American kestrels, golden eagles, and great horned owls. Other mammal species include coyotes, jackrabbits, cottontail rabbits, badgers and various small

rodents. Passerine bird species include Townsend's solitaires, mountain chickadees, plain tit mice, robins, black-billed magpies, Clark's nutcrackers, scrub and Steller's jays, and numerous sparrow species.

VEGETATION

Vegetation within the WSA is predominantly big sage with scattered juniper which covers the open slopes of Tule Mountain. Within the open big sage

areas large isolated stands of mountain mahogany with occasional Ponderosa pine occur. Most drainages and many slopes, particularly on the east side of the mountain support dense juniper. At the top of Tule Mountain are 105 acres of White fir and Jeffrey pine.

No sensitive plant species or habitats are known to occur within the Tule Mountain WSA.

CULTURAL RESOURCES

Archaeological sampling in the WSA was conducted at a seven percent level. The sampling unit covered the area around Tule Lake south of the WSA boundary as well as the WSA. Overall archaeological sensitivity in the survey area was low to medium. The whole survey area averaged one site per 197 acres. National Register Quality sites were found only around Tule Lake with only one of these sites occurring just inside the southeast boundary of the WSA. Tule Lake is of medium sensitivity and the WSA area of very low archaeological sensitivity.

MINERALS/ENERGY DEVELOPMENT

Mineral and energy potential in the WSA are very low. There are no existing mining claims. Approximately 1,600 acres are under lease for oil and gas. These are highly speculative as potential for discovery or production is considered very low. At this time, no exploratory wells have been drilled on public lands administered by the Susanville District. Basalt found at the top of Tule Mountain could be used as decorative stone such as flat rock or lava moss rock. Access to the site is poor with decorative stone available from other locations outside the WSA. There is no current decorative stone collected from the WSA.

LIVESTOCK GRAZING

The WSA contains portions of two grazing allotments with 2,570 AUMs currently allotted in the WSA. These are summarized below.

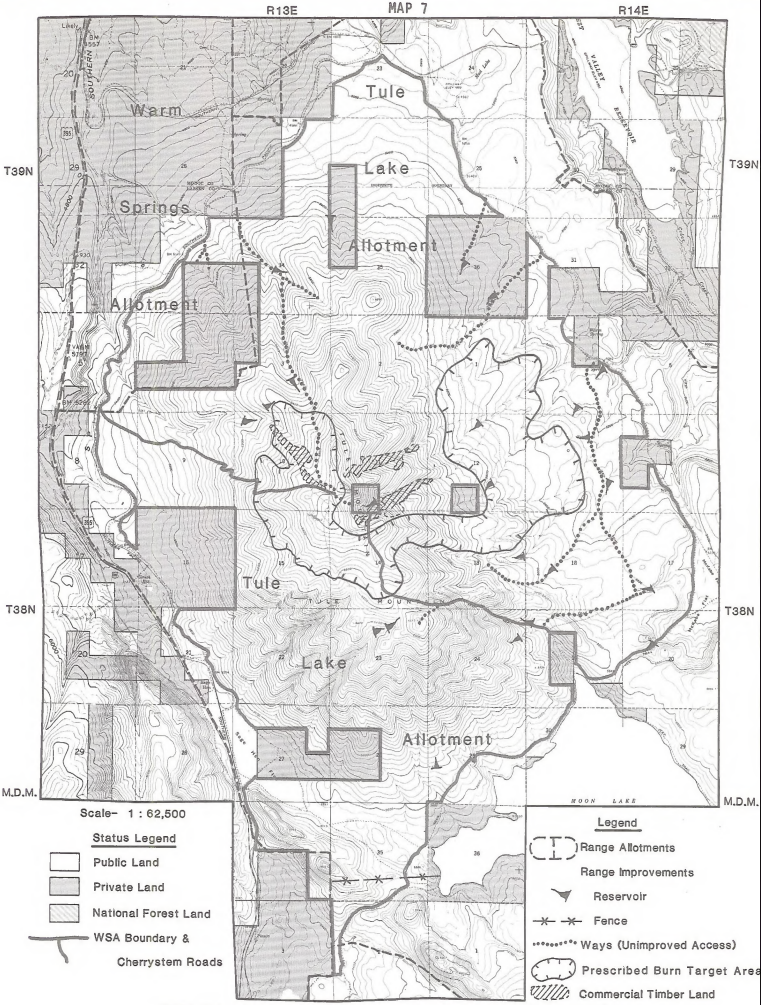
Allotment	Total Acres	Percent of Acres in WSA	Total AUMs in WSAs	Permittees
Tule Lake	59,783	28	2,535	6
Warm Springs	4,114	28	35	1

An allotment management plan (AMP) is in effect for the Tule Lake allotment. The system is a deferred three pasture rest rotation system. Pasture number 2 is grazed every year. Pasture numbers 1 and 3 are rested and grazed in alternate years. The WSA is entirely contained within pasture number 1 and is grazed every other year. Both allotments have rangeland developments to manage livestock distribution including 19 livestock pit reservoirs and 4 1/2 miles of fence. These developments have been constructed by the BLM, the permittees, or both, through cooperative agreements. A prescribed burn is proposed to increase forage production by 66 AUMs. No other livestock facilities or range improvements are proposed. (See Map 7, page 45.)

TIMBER

The WSA has 105 acres of commercial timber land on the upper slopes of Tule Mountain. The timber land is covered with white fir and Jeffrey pine, portions of which are overstocked for commercial purposes. An additional 46 acres of timber site require planting to return them to producing status. Stocking is required due to fires which burned the area in the past. Thinning and planting would be required to realize timber potential on Tule Mountain. The timber resources in the WSA have not been included in any timber harvesting plans or projections. Approximately 16 thousand board feet of annual cut volume is projected for this resource in the WSA, which amounts to less than three percent of the Susanville District's annual allowable cut. The location and area of commercial timber lands is shown on Map 7 on page 45.

Additionally, there are 900 acres of accessible juniper stands on the lower slopes of Tule Mountain along the eastern boundary of the WSA. The area has not been designated a firewood cutting area in the past but has the potential to supply up to 50 cords of standing fuelwood per year.



Tule Mountain Wilderness Study Area (CA-020-211)

MAP 7 : EXISTING RESOURCES AND RANGE Environment

Chapter 4

Environmental Consequences

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter focuses directly on the issues identified in Chapter 1. For each WSA the environmental impacts of each alternative are described issue by issue. The environmental impacts of these alternatives on the areas' other resources have also been assessed and have been found to be insignificant.

Because of the general nature of this analysis and the lack of numerical and statistical information regarding the areas' resources, impacts in this chapter are often expressed in relative terms. For the purpose of this analysis the meanings of these terms are as follows:

- Negligible or slight impact - the degree of anticipated environmental impact is considered less than minor.

- Minor impact - comparatively unimportant; in terms of the area's wildlife resources, a minor impact is one affecting a specific group of individuals of a population in a localized area for one generation or less; the integrity of the regional population is not likely to be affected.

- Moderate impact - an effect sufficient enough to cause a change in the abundance of a resource or its distribution. In terms of the area's wildlife, the abundance or distribution of a portion of the regional or local population would change over more than one generation, but would not affect the integrity of the regional population as a whole.

- Major impact - an effect sufficient enough to cause a decline in the abundance of a resource or a change in distribution of a resource. In terms of the area's wildlife, the abundance or distribution of the regional or local population of a species would decline beyond which natural recruitment would not likely return that population to its former level within several generations.

PIT RIVER CANYON WSA
(CA-020-103)

PROPOSED ACTION (PARTIAL WILDERNESS): 6,640 Acres Recommended for Wilderness Designation
4,935 Acres Non-Wilderness

Under the Proposed Action, 6,640 acres would be recommended as suitable for wilderness designation. The remaining 4,935 acres would not be recommended as suitable for wilderness designation and would be managed for multiple use.

The primary impacts of this alternative relate to wilderness values and motorized recreation use.

Impact on Wilderness Values

Under the Proposed Action, 6,640 acres would be designated wilderness and would receive special legislative protection for all wilderness values. Wilderness values of naturalness, solitude, primitive and unconfined recreation and special features including raptor nesting sites, high scenic quality, National Register Quality historical and archeological sites, and native fisheries would be retained or enhanced except for areas affected by proposed livestock grazing projects permissible under wilderness management where there would be slight local impacts to naturalness and solitude.

Wilderness values on the remaining 4,935 acres would not receive special legislative protection and would be subject to the effects of multiple use resource management primarily continued motorized recreation use and livestock grazing use.

- Naturalness

  There would be a slight positive benefit to naturalness as a result of closure of 6,640 acres including three miles of primitive vehicle routes which would eliminate approximately 100 visitor days of motorized recreation use. This use is predominantly associated with hunting access which occurs in the upland area of the WSA above the canyon rim. These primitive vehicle routes would naturally revegetate with invading grasses within two years which would eliminate the bare soil appearance. However, until the sagebrush and other shrub species become established these closed routes would continue to appear as "two-tracks" for up to five years. There are no vehicle routes within the canyon areas, therefore, there would be no benefit below the rim of the canyon.

  Livestock use would continue to be allotted at 1,520 AUMs throughout the WSA. This use occurs on the upland portions of the WSA and not within the canyon area. The existing level of naturalness, which can appear as overuse within individual pasture areas would be improved as a result of the development of three allotment management plans (AMPs). The AMPs would prescribe management for all allotments except the Thompson allotment which includes approximately 550 acres with 50 AUMs of upland area along the east boundary of the WSA. the AMPs would establish a rest/rotation grazing system for pastures within the wSA and prevent overutilization of the forage improving the natural condition of the pastures.

  Livestock projects proposed for the WSA include one pit reservoir and one spring development with a livestock exclosure. Both projects would occur within the portion of the WSA designated as wilderness. The reservoir construction would result in approximately one-quarter acre of surface disturbance and be visible from up to one-quarter mile away. The perception of naturalness would be slightly impaired

within a 150 acre viewshed. The spring development would occur at Mud Spring and involve the construction of a spring box with a buried pipeline to a trough located at the edge of an exclosure fence around approximately three acres of the meadow. The project would result in an improvement of wildlife habitat within the surrounding meadow by precluding livestock use. There would be a localized negligible adverse impact to naturalness as a result of approximately 800 feet of wire fencing around the three acre meadow.
The perception of naturalness would be slightly impaired within an area of approximately 50 acres.

Maintenance of seven existing and one proposed, pit reservoirs would continue to re-establish fresh surface disturbances around the perimeter of the reservoirs on a five to ten year cycle. Three of the existing reservoirs plus the proposed reservoir would be located within the designated portion of the WSA resulting in vehicle tracks across primitive vehicle routes that would have been re-established with vegetation as a result of closure to motorized recreation use. The remaining four reservoirs would not be within the designated wilderness area and would be accessible by existing primitive vehicle routes that would continue to be in use. The overall impact to naturalness would be localized and negligible as a result of this continued maintenance cycle.

Establishing six photo monitoring points at three cultural resources sites, each marked by a surface level stake in the ground would not result in any negligible impacts to naturalness. The photo monitoring points would be within the designated portion of the WSA and allow detection of theft, vandalism or impacts associated with motorized recreation or livestock use.

Acquisition of 740 acres of private lands within the canyon and above the rim along the Pit River would contribute to maintaining naturalness within the designated portion of the WSA by precluding any potential development that could occur should the parcel remain in private ownership.

The continued motorized recreation use within the 4,935 acres not designated wilderness would maintain five miles of existing primitive vehicle routes in an unnatural condition. While the majority of the projected 650 visitor days are concentrated in the fall, this is considered a low impact period occurring prior to the wet season and after the growing season. Overall the perception of naturalness would not significantly change since vehicle use is prescribed in the RMP as limited to the existing designated routes resulting in minor impacts to naturalness.

Construction of a trailhead/parking area within the nondesignated portion of the WSA would result in the clearing and

grading of less than a 1/4 acre site along an existing primitive vehicle route. This would impair the perception of naturalness within a 40 acre area on the northwest slope of Second Butte while being isolated from the remainder of the WSA by the steep sloped butte.

- Solitude

Opportunities for solitude would increase slightly within the 6,640 acres of the WSA designated wilderness as a result of closing three miles of primitive vehicle routes and eliminating 100 visitor days of motorized vehicle use. Due to the overall low level of use, except during the hunting season, solitude would only be enhanced slightly in the upland areas where the existing routes and vehicle use occurs. Since there is no vehicle use in the canyon areas, solitude would remain unchanged except for eliminating occasional vehicle use along the canyon rim.

Construction of the proposed livestock projects would result in minor localized, short-term adverse impacts on solitude within the designated area. The livestock reservoir would require two days of bulldozer excavation and grading with a pick-up truck as a support vehicle within the one-quarter acre project site as well as along the access routes. The noise and activity resulting from the construction would be short-term over the two days necessary for construction. There would be a minor impact overall as the sense of solitude would be lost within an area of 150 acres surrounding the project site over the two day construction period. Construction of the spring development including the construction of the exclosure fence around the three acre meadow would result in only negligible impacts on solitude. Maintenance of the seven existing livestock reservoirs as well as the proposed reservoir and spring development would result in only negligible short-term impacts. Due to the infrequency of maintenance requiring a total of eight days of vehicle use, including a bulldozer and a pick-up truck on a five to ten year cycle. There would be no significant impacts on solitude either within the designation portion with a total of four reservoirs and one spring development on the nondesignated portion with four reservoirs.

Continued motorized recreation use, plus a projected 50 visitor increase would result in 650 visitor days of use on the remaining five miles of primitive vehicle routes within the 4,935 acres not designated as wilderness. This use is predominantly related vehicle access for deer hunting (500 visitor days) occurring during the first two weeks in October for the deer hunting season. During this concentrated period of use solitude within all but the 1,860 acres below the canyon rim is subjected to moderate short-term impacts. The remaining projected low level of use would not diminish solitude beyond a negligible impact.

Consequences

Vehicle use associated with the trailhead/parking area construction in the nondesignated portion would be confined to a 40 acre area in the nondesignated portion of the WSA on the northwest slope of Second Butte. A bulldozer and two support vehicles (pick-up trucks) would amount to a minor localized impact on solitude. Impacts to solitude would be localized and negligible of the short-term of two days for construction. Occasional vehicle use associated with use of the trailhead/parking area for access to the designated portion of the WSA would only slightly impact solitude due to the low level of projected non-motorized use (250 visitor days per year).

- Primitive and Unconfined Recreation

Closure of the 6,640 acres of the WSA designated as wilderness to motorized recreation use would result in a slight overall increase in opportunities for primitive and unconfined recreation. Since the canyon areas offer the most extensive primitive and unconfined recreation opportunities within the WSA and vehicle use does not occur in the canyon areas, there would not be a significant benefit or increase in opportunities . On the contrary, closure of the existing primitive vehicle routes may limit opportunities for primitive and unconfined recreation by precluding vehicle access to the canyon rim, making the canyon more less accessible particularly for fishermen. However, there is not a significant loss of use anticipated. Construction of the trailhead/parking area in the nondesignated portion of the WSA just outside the designated wilderness portion would provide additional non-motorized access opportunities while utilizing closed primitive vehicle routes as foot trails.

- Special Features

Within the 6,640 acres of the WSA there would be a slight positive benefit to special features as a result of eliminating motorized recreation use. Cultural resources would have potential vulnerability to theft and vandalism reduced although there has not been a significant problem to date. Photo monitoring points would also benefit cultural resources by establishing a monitoring record to aid in establishing protective or mitigating measures if necessary. Acquisition of a 740 acre parcel along the Pit River Canyon would benefit raptors within the WSA by providing protection of additional and potential nest sites occurring on the parcel. Additionally, the integrity of the canyon areas would be retained benefiting scenic quality. The condition of the native fisheries would continue to thrive and remain unchanged under the Proposed Action since there are no management actions that would affect the Pit River or Horse Creek.

Conclusion

Wilderness designation of 6,640 acres within the Pit River Canyon WSA would result in slight positive benefits to the wilderness values particularly naturalness and solitude due to the prohibition of motorized recreation use (100 visitor days). Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest rotation grazing system to prevent overuse of pastures. The perception of naturalness would be impaired on a total of 200 acres from construction of a pit reservoir and a spring development. However, impacts would be highly localized and would not result in any significant impacts to solitude in relation to the entire WSA. Acquisition of 740 acres along the Pit River Canyon and rim area would result in a slight benefit to naturalness and primitive unconfined recreation as well as special features such as raptor nesting habitat and scenic quality. In the nondesignated portion of the WSA, wilderness values would be only slightly diminished due to the continued and projected motorized recreation use (650 visitor days) as well as continued maintenance of existing livestock reservoirs.

Impacts on Motorized Recreation Use

Wilderness designation would close 6,640 to motorized recreation use, including three miles of primitive vehicle routes. Approximately 100 visitor days would be displaced. This use is primarily related to vehicle access for hunting. It is anticipated that 50 of these visitor days would be displaced outside the WSA to other available public lands with hunting opportunities within the Alturas Resource Area and Susanville District. Cherry stemmed roads, boundary roads, and the existing five miles of primitive vehicle routes would provide continued opportunities for motorized recreation use for a projected 650 visitor days.

Conclusion

There would be only negligible impacts on motorized recreation use as three miles of primitive vehicle routes would be closed with 100 visitor days foregone within the 6,440 acres designated wilderness. There are other opportunities outside the WSA for motorized recreation use that are similar as well as continued access opportunities resulting from cherry stemmed roads, boundary roads and existing primitive vehicle routes within the nondesignated portion of the WSA where use is projected at 650 visitor days.

Adverse Impacts Which Cannot Be Avoided

There are no projected management actions or surface disturbances that would result in any significant unavoidable adverse impacts. Continued livestock grazing, surface disturbance from construction of a pit

reservoir, a spring development, and a trailhead/parking area as well as the low level of motorized recreation use would only locally result in negligible adverse impacts.

Relationship Between Local Short-Term Uses of Man's Environmental and the Maintenance and Enhancement of Long-Term Productivity

Under the Proposed Action development options would be restricted within the 6,640 acres of the WSA designated as wilderness. However, all current short-term uses would continue except for motorized recreation use which would be prohibited in the designated portion. The long-term productivity would be slightly enhanced.

Within the 4,935 acres of the WSA not designated wilderness all present short-term uses would continue. The long-term productivity of the WSA would be maintained and not significantly affected by the projected low level of motorized recreation use and livestock grazing use. Without wilderness designation the possibility of activities such as mineral development that could reduce long-term productivity is greater than under wilderness designation. However, in the Pit River WSA the mineral potential is considered to be very low and no mineral development is anticipated.

Irreversible and Irretrievable Commitments of Resources

Due to the low levels of projected motorized recreation use and livestock grazing use as well as less than a half acre surface disturbance anticipated from proposed livestock projects and a trailhead/parking area development no irreversible and irretrievable commitments of resources are anticipated. Additionally, there are no mineral development activities anticipated, therefore, no irreversible or irretrievable commitment of resources is expected.

ALL WILDERNESS ALTERNATIVE

11,575 Acres Recommended for Wilderness Designation
0 Acres Non-wilderness

Under this alternative, the entire 11,575 acres of the Pit River Canyon WSA would be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to the protection of wilderness values and the prohibition of motorized recreation use.

Impact on Wilderness Values

Under the All Wilderness Alternative, all 11,575 acres of the Pit River Canyon WSA would be designated wilderness. All wilderness values within the WSA would receive special legislative protection provided by wilderness designation. Wilderness values of naturalness, solitude, primitive and

unconfined recreation and special features including raptor nesting sites, high scenic values, National Register quality historical and archaeological sites, and native fisheries would be retained or en- hanced.

- Naturalness

  There would be a slight positive benefit to naturalness within the WSA as a result of prohibiting motorized recreation use. The current 700 visitor days of vehicle use would be eliminated and eight miles of existing primitive vehicle routes would be closed. This use is predominantly associated with hunting access which occurs in the upland areas of the WSA above the canyon rim. These primitive vehicle routes would naturally revegetate with invading grasses within two years which would eliminate the bare soil appearance. However, until the sagebrush and other shrub species become established these closed routes would continue to appear as "two-tracks" for up to five years. There are no vehicle routes within the canyon areas, therefore, there would be no benefit below the rim.

  As described under the Proposed Action, livestock use would continue at the current level of 1,520 AUMs, and two proposed livestock projects (a reservoir and a spring development) would be constructed and maintained along with seven existing livestock reservoirs. There would be only slight localized impacts to naturalness with the perception of naturalness impaired on approximately 200 acres. Three AMPs would be prepared to establish a rest/rotation grazing system for pastures in the WSA resulting in a slight positive benefit to naturalness as described under the Proposed Action.

  The six photo monitoring points established for monitoring three cultural resource sites would not result in any negligible impacts as described under the Proposed Action.

  Acquisition of 1,300 acres of private lands within the canyon and above the rim along both the Pit River and Horse Creek would contribute to maintaining naturalness within the WSA by precluding any potential development that could occur should be parcels remain in private ownership.

  The trailhead/parking area proposed under the Proposed Action would not be permitted resulting in a retention of naturalness within the 1/4 acre project area and 40 acre viewshed.

- Solitude

  Opportunities for solitude would increase slightly with the closure of eight miles of primitive vehicle routes and elimination of 700 visitor days of vehicle use occurring in the upland portions of the

WSA. However, two cherry stem roads in the southern portion of the WSA within Clark Valley would continue to be utilized disrupting the sense of solitude within the vicinity of the roads. Since no vehicle use occurs within the canyon area of the WSA, solitude would remain unchanged except for eliminating occasional vehicle use along the rim. Due to the overall low level of use except for the concentrated use for two weeks in October during deer hunting season there would be only slight benefits to solitude.

Construction of the two proposed livestock projects and maintenance including the seven reservoirs would only result in localized, short-term impacts to solitude as described under the Proposed Action.

The construction and subsequent use of the trailhead/parking area proposed under the Proposed Action would not occur resulting in a retention of solitude within the project area.

- Primitive and Unconfined Recreation

Closure of the entire WSA to motorized recreation use would result in a slight increase in opportunities for primitive and unconfined recreation. Closure of the existing primitive vehicle routes may limit opportunities for primitive and unconfined recreation by precluding vehicle access to the canyon rim, making the canyon areas less accessible, particularly for fisherman. However, a significant loss of use is not anticipated.. Acquisition of private lands in the northeast portion of the WSA that include approximately 1 1/2 miles of the Pit River Canyon surrounded by public lands would increase opportunities for primitive and unconfined recreation by providing additional access to the canyon.

- Special Features

Wilderness designation of the entire WSA would result in a slight positive benefit to special features as a result of eliminating motorized recreation use. Potential vulnerability of cultural resources to theft and vandalism would be reduced, although there has not been a significant problem to date. Photo monitoring points would also benefit cultural resources by establishing a monitoring record to establish protective or mitigating measures if necessary. Acquisition of 1,300 acres of private land along the canyon areas of the Pit River and Horse Creek would benefit raptors within the WSA by establishing protection of additional and potential nest sites on the private lands. Additionally, scenic quality would be enhanced by maintaining the integrity of the canyon areas. The condition of the native fisheries would continue to thrive and remain unchanged since there are no management actions proposed that would affect the Pit River or Horse Creek.

Conclusion

Wilderness designation would have a slight positive benefit on wilderness values particularly in the upland areas where motorized recreation use has diminished the perception of naturalness and sense of solitude. Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest/rotation grazing system to prevent overuse of pastures. Acquisition of 1,300 acres along the canyon areas would slightly benefit naturalness and primitive and unconfined recreation as well as special features including raptor nesting sites and scenic quality. Additionally, long-term protection from unanticipated future actions that could result in potential adverse impacts would be provided.

Impacts on Motorized Recreation Use

Wilderness designation would close the entire WSA to motorized recreation use. Eight miles of existing primitive vehicle routes would be closed eliminating 700 visitor days of vehicle use. This use primarily is associated with vehicle access for deer hunting. While the existing primitive vehicle routes would be closed, boundary roads and the two cherry stemmed roads in the Clark Valley area in the southern portion of the WSA would continue to provide access resulting in 600 visitor days continuing to utilize the WSA for hunting without the use of motorized vehicles within the WSA. Additionally, there are similar opportunities for motorized recreation use outside the WSA on lands within the Alturas Resource Area and Susanville District. Therefore, impacts to motorized recreation use would be minor.

Conclusion

The entire WSA would be closed to motorized recreation use, eliminating 700 visitor days of vehicle use. However, the majority of this use is associated with vehicle access for hunting which would continue to use boundary roads and existing cherry stem roads. Only minor adverse impacts are anticipated due to the overall low level of use.

NO WILDERNESS/NO ACTION ALTERNATIVE

0 Acres Recommended for Wilderness Designation
11,575 Acres Non-wilderness

Under this alternative, none of 11,575 acres in the Pit River Canyon WSA would be recommended as suitable for wilderness designation and would be managed for multiple use under the Alturas Resource RMP which would be the same as the Proposed Action except for designation of a portion of the WSA as wilderness.

The primary impacts under this alternative relate to wilderness values and the effect of continued motorized recreation use and livestock grazing.

Consequences

Impact on Wilderness Values

The No Wilderness/No Action Alternative would not provide special legislative protection for any of the wilderness values. Wilderness values, primarily naturalness and solitude would be subjected to continued motorized recreation use and livestock grazing including a proposed livestock reservoir and spring development.

- Naturalness

  Approximately eight miles of existing primitive vehicle routes would remain open with the current 700 visitor day projected to remain stable. The RMP prescribes use as limited to designated routes and trails. The continued use of these eight miles of primitive vehicle routes would maintain the travel ways in an unnatural condition. The majority of the 700 visitor days occur during the two week deer hunting season each October. This is considered a low impact period occurring prior to the wet season and after the growing season. Vehicle use is limited to the upland areas of the WSA due to the lack of vehicular access to the canyons and the lack of existing vehicle routes within the canyon areas. Overall the perception of naturalness would not significantly change since vehicle use is limited to the existing designated routes resulting in minor impacts to naturalness.

  As described under the Proposed Action, livestock use would continue at the current level of 1,520 AUMs and two proposed livestock projects (a reservoir and a spring development) would be constructed and maintained along with seven existing livestock reservoirs. There would be only slight localized impacts to naturalness with the perception of naturalness impaired on approximately 200 acres. Three AMPs would be prepared to establish a rest/rotation grazing system for pastures in the WSA resulting in a slight positive benefit to naturalness as described under the Proposed Action.

  The six photo monitoring points established for these cultural resource sites would not result in any negligible impacts as described under the Proposed Action.

  Acquisition of 740 acres of private lands within the canyon and above the rim along the Pit River would contribute to maintaining naturalness along the canyon as described under the Proposed Action.

  The trailhead/parking area proposed under the Proposed Action would not be constructed since access points would continue to be open within the WSA resulting in the retention of naturalness within the 1/4 acre project site and 40 acre viewshed.

- Solitude

Occasional vehicle use as well as the concentrated use associated with deer hunting season occurring during the first two weeks of October each year would maintain the existing level of solitude within the vicinity of the eight miles of existing primitive vehicle routes. The current 700 visitor days of vehicle use slightly diminish the overall sense of solitude. However, the concentrated (500 visitor days) use during hunting season results in a moderate short-term impact to solitude throughout the WSA except for the 1,860 acres of canyon area.

Construction of the two proposed livestock projects (a reservoir and a spring development) and maintenance including the seven existing livestock reservoirs would only result in minor localized short-term impacts to solitude as described under the Proposed Action.

The construction and subsequent use of the trailhead/parking area proposed under the Proposed Action would not occur, resulting in a retention of solitude within the project area.

- Primitive and Unconfined Recreation

Continued motorized recreation use (700 visitor days) would occur primarily on eight miles of existing primitive vehicle routes and only negligibly impact opportunities for primitive and unconfined recreation. Since the canyon areas offer the most extensive primitive and unconfined recreation opportunities within the WSA and vehicle use is precluded in these areas due to lack of access and vehicle routes, opportunities would remain basically unchanged overall. Additionally, vehicle access to the canyon rim would continue to make the canyon areas more accessible, particularly for fishermen.

- Special Features

Continued vehicle use would result in a potential vulnerability of cultural resource sites to theft and vandalism although there has not been a significant problem to date. Establishing a total of six photo monitoring sites at the three National Register Quality sites would aid in establishing protective or mitigating measures should the need arise. Acquisition of the 740 acres parcel along the Pit River Canyon would benefit raptors within the WSA by providing additional or potential nest sites. The condition of the native fisheries would continue to thrive and remain unchanged since there are no management actions that would affect the Pit River or Horse Creek. Additionally, since there are no projected management actions the integrity of the canyon areas would be retained benefiting scenic quality.

Conclusion

Continued motorized recreation use and livestock grazing would slightly diminish the wilderness values primarily naturalness and solitude. Construction and maintenance of a proposed livestock project as well as maintenance of existing projects would result in highly localized minor impacts, with the perception of naturalness and the sense of solitude impaired on a total of 200 acres. Development of three AMPs for livestock grazing would result in a slight benefit to naturalness due to establishing a rest/rotation grazing system to prevent overuse of pastures. Opportunities for primitive and unconfined recreation would be slightly impacted in the upland areas, although the opportunities in the canyon areas would be retained. Acquisition of 740 acres along the Pit River Canyon would slightly benefit special features.

Impacts on Motorized Recreation Use

Under the No Wilderness/No Action Alternative the entire WSA would be open to motorized recreation use as prescribed in the RMP as limited to designated routes and trails. Eight miles of existing primitive vehicle routes would remain open with the current 700 visitor days remaining stable. Since there is no access to the canyon areas and no existing routes, motorized recreation use within the canyon areas would continue to be precluded. The majority of the existing motorized recreation use supports vehicle access for hunting which would be concentrated during the first two weeks of October for deer hunting season.

Conclusion

There would be no impact on motorized recreation use in the WSA. The current 700 visitor days would remain stable with the existing eight miles of primitive vehicle routes open for use.

TULE MOUNTAIN WSA
(CA-020-211)

PROPOSED ACTION (NO WILDERNESS/NO ACTION)

0 Acres Recommended for Wilderness Designation
16,950 Acres Non-wilderness

Under the Proposed Action, none of the 16,950 acres in the Tule Mountain WSA would be recommended as suitable for wilderness designation and would be managed for multiple uses.

The primary impacts under this alternative relate to wilderness values as a result of continued motorized recreation use, livestock grazing use including a prescribed burn and projected intensive timber management.

Impact on Wilderness Values

Under the Proposed Action, none of the WSA would be designated wilderness and none of the wilderness values on the 16,950 acres would receive the special legislative protection provided by wilderness designation. These values consist of naturalness, solitude, and primitive and unconfined recreation. Impacts on wilderness values would result from continued motorized recreation use, intensive timber management, a prescribed burn to increase livestock grazing use, and continued maintenance of existing livestock projects.

- Naturalness

  The continued use of motor vehicles on 20 miles of existing primitive vehicle routes would maintain these routes in an unnatural condition. Additionally, since the RMP designates the area as open to vehicle use there would be a potential proliferation of routes and trails within the WSA which would result in a minor impact due to the 1,100 visitor days per year of motorized recreation use. The majority of this use (1,000 visitor days) occurs in relation to vehicle access for hunting during the two week deer hunting season each October. This is considered a low impact period occurring prior to the wet season and after the growing season which contributes to reducing the potential for significant impacts. The proposed prescribed burn would increase accessibility within a 2,000 acre area further diminishing the perception of naturalness.

  The prescribed burn to increase livestock forage would result in a short-term minor impact on naturalness. Approximately 2,000 acres within a 3,000 acre target area would be burned resulting in a charred and blackened landscape. The prescription for the fire would be targeted to burn large areas of big sage within a mixed sagebrush/juniper landscape. The resulting effect would be to set back the successional pattern to re-establish a dominance of grasses rather than sage in the open areas. No construction of fire lines would occur as use of a helitorch to conduct the burn within the specified prescription would control the fire and meet the objectives to burn within the identified big sage areas. Within two growing seasons the area would return to a natural appearance, duplicating the surrounding landscape patterns. The slight increase of 66 AUMs would have negligible impacts on naturalness.

  Intensive timber management within 151 acres of the WSA (less than one percent of the WSA) would initially improve naturalness through restocking of 46 acres of commercial timber land damaged by past fires. The precommercial thinning of 105 acres would result in minor localized impacts due to slash piles and debris. Within 20 years, a 200 MBF selective commercial thinning cycle would begin which would impair the perception of naturalness within three areas totalling approximately 300 acres on the upper slopes of Tule Mountain.

Construction of spur roads from the existing cherry stemmed roads would total less than one mile. The road construction would occur in areas of juniper woodland which would tend to limit the potential adverse visual impacts by screening the roads, thereby localizing the impacts.

Fuelwood harvesting within a 900 acre area along the eastern boundary of the WSA would have a minor localized impact on naturalness. An estimated 50 cords per year of standing fuelwood would be cut from dense juniper stands. Evidence of tree stumps and slash would be apparent in localized areas after fuelwood cutting.

- Solitude

Concentrated motorized recreation use (1,000 visitor days) within the two week deer hunting season in October would continue to result in short-term moderate impacts on solitude. However, over the remainder of the year, the 100 visitor days of occasional motorized recreational use would result in only negligible impacts to solitude. These impacts would occur primarily within the vicinity of the 20 miles of existing vehicle routes although limited cross-county travel would occur. The variety of vegetation, particularly the dense stands of juniper and big sage would lessen the level of impacts and tend to confine the affected areas.

Vehicle use and activity associated with the prescribed burn including the use of a helicopter would detract from the sense of solitude within the WSA over a three day period. These impacts would be minor and of a short-term nature resulting in no significant effects on solitude within the WSA. Additionally, the result of the burn would have a slight positive effect on solitude by making more isolated spaces available within the thick vegetative cover.

Impacts to solitude as a result of maintenance of 19 existing livestock reservoirs would continue at the present levels which are negligible and localized to the reservoir sites and along existing vehicle routes used for access. Maintenance of the reservoirs would occur on a five to ten year cycle requiring the use of a bulldozer and pick-up truck for one day per reservoir. Maintenance of existing fences within the WSA would result in only negligible impacts to solitude within the vicinity of the fence lines. Annual inspection and maintenance of the 4 1/2 miles of existing fences would be done on horseback and require only one day. Major maintenance of the fences would occur approximately every ten years requiring two days of pick-up truck use to supply materials.

Timber harvest activities would be short-term and highly localized. However, selective commercial thinning occurring over a two month period every 20 to 30 years would result in a loss of solitude within a 300 acre area and along the cherry stemmed access roads.

Vehicle use and activity associated with harvest of 50 cords of fuelwood would have only infrequent minor impacts on solitude as a result of the low level of use (less than 50 vehicle trips). Chainsaw use would be audible along the eastern boundary of the WSA during fuelwood cutting activity. The designated fuelwood cutting area would be within one-half mile of the boundary road and would not effect the majority of the WSA.

- Primitive and Unconfined Recreation

The continued use of motor vehicles (1,100 visitor days) during the two week deer hunting season would significantly diminish opportunities for primitive and unconfined recreation within the WSA. Occasional motorized recreation use (100 visitor days) would have only a negligible impact on these opportunities. However, due to the lack of destinations, physical features, and perennial streams and springs, less than 50 visitor days of motorized recreation use occurs.

The prescribed burn would open 2,000 acres allowing additional access for hiking and horseback riding.

Timber harvesting would preclude opportunities for primitive and unconfined recreation during harvesting activities occurring of a two month period every 20 to 30 years within the 300 acres surrounding and including the harvest area.

- Special Features

The WSA has no identified ecological, geological or other special features. Therefore, management actions under the Proposed Action would not impact any special features.

Conclusion

There would be slight to minor impacts on naturalness, solitude, and primitive and unconfined recreation throughout the WSA except for short-term and localized adverse impacts. Continued motorized recreation use (1,100 visitor days) would result in a minor impact to naturalness as well as a short-term moderate impact to solitude during the two week deer hunting season. The prescribed burn would have a minor short-term impact on naturalness within the 2,000 acre burn area with minor impacts to solitude over the three day operation. Timber harvesting would impair naturalness within a 151 acre area and disrupt solitude for two months every 20 to 30 years. Other activities including fuelwood harvesting and maintenance of existing livestock facilities would result in negligible to minor localized impacts particularly to solitude.

Impacts on Motorized Recreation Use

Under the Proposed Action, motorized recreation use would continue within the 16,950 acres of the Tule Mountain WSA. The Alturas Resource Area RMP designates the area as open to vehicle use with no specific restrictions or limitations to existing routes and trails. The existing 20 miles of primitive vehicle routes would remain open. Motorized recreation use within the WSA consists of 1,100 visitor days with 1,000 of these visitor days attributed to deer hunting during the annual two week deer hunting season in October. Motorized recreation use is anticipated to remain stable with no increases anticipated in the foreseeable future as opportunities remain available in the WSA.

Conclusion

There would be no impact on motorized recreation use in the WSA. The current 1,100 days of motorized recreation use would remain stable with the entire WSA open to motorized vehicle use including 20 miles of primitive vehicle routes.

Impacts on Livestock Grazing and Range Improvements

The proposed 2,000 acre prescribed burn within a 3,000 acre target area on the upper slopes of Tule Mountain would be implemented under the Proposed Action. An increase of 66 AUMs is anticipated due to an increase in available forage resulting in a total use of 2,636 AUMs. There are no other livestock facilities or projects anticipated within the WSA. Maintenance of existing facilities including 19 reservoirs and 4 1/2 miles of fence would continue.

Conclusion

There would be no impact on livestock grazing and range improvements. A 2,000 acre prescribed burn would be permitted resulting in an increase of 66 AUMs for a projected total of 2636 AUMs.

Adverse Impacts Which Cannot Be Avoided

The only unavoidable adverse impacts would be related to timber harvest. These impacts will be greatly reduced through careful preplanning and immediate reclamation of disturbed sites. Other activities such as continued motorized recreation use, prescribed burning and fuelwood cutting would result in only minor and often short-term impacts.

Relationship Between Local Short-Term Uses of Man's Environmental and the Maintenance and Enhancement of Long-Term Productivity

If the WSA is not designated wilderness, all present short-term uses such as motorized recreation, hunting, hiking and livestock grazing would continue. Future development options would remain open including projected intensive timber management, fuelwood harvesting, and a proposed

prescribed burn to increase livestock forage. Management actions projected for the WSA under the Proposed Action would not likely result in any significant adverse impacts on long-term productivity. Without wilderness designation the potential for activities such as mineral development that could reduce long-term productivity is greater than under wilderness designation. However, in the Tule Mountain WSA, mineral potential is considered very low and no mineral development is anticipated including the 1,600 acres under oil and gas lease.

Irreversible and Irretrievable Commitments of Resources

The projected low levels of motorized recreation use, and livestock grazing use as well as timber harvesting on 151 acres and a 2,000 acre prescribed burn would not result in any anticipated irreversible and irretrievable commitments of resources. Additionally, there are no mineral development activities anticipated, therefore, no irreversible commitment of resources is expected.

ALL WILDERNESS ALTERNATIVE

16,950 Acres Recommended for Wilderness Designation
0 Acres Non-wilderness

Under this alternative, the entire 16,950 acres of the Tule Mountain WSA would be recommended as suitable for wilderness designation.

The primary impacts under the alternative relate to the protection of wilderness values and the prohibition of motorized recreation use and a prescribed burn for an increase in livestock use.

Impact on Wilderness Values

Under the All Wilderness Alternative, all 16,950 acres of the Tule Mountain WSA would be designated wilderness. All wilderness values within the WSA would receive special legislative protection provided by wilderness designation. Wilderness values of naturalness, solitude, and primitive and unconfined recreation would be retained.

- Naturalness

  There would be a slight positive benefit as a result of closing the entire WSA to motorized recreation use. The current 1,100 visitor days of vehicle use would be eliminated and the existing 20 miles of primitive vehicle routes would be closed and allowed to rehabilitate naturally. Revegetation would occur slowly with grasses invading the routes within two years and sage and juniper requiring up to ten years to become established. A projected 600 visitor day increase in non-motorized recreation use for a total of 650 visitor days would continue to utilized portions of the existing vehicle routes as foot trails.

Livestock use would continue at the current level of 2,570 AUMs. However, the proposed prescribed burn and resulting increase in AUMs would be prohibited. There would be a minor short-term positive benefit to naturalness by not conducting the 2,000 acre prescribed burn retaining the existing perception of naturalness.

Throughout the remainder of the WSA naturalness would be retained, particularly on the upper slopes of Tule Mountain and on the lower slopes along the eastern boundary as a result of precluding projected timber harvesting and fuelwood cutting. However, by precluding intensive timber management, restocking 46 acres of commercial timber land that have been damaged by past fires would be prohibited. A slight positive benefit to naturalness would be foregone.

- Solitude

There would be a slight positive benefit as a result of prohibiting motorized recreation use and eliminating 1,100 visitor days of vehicle use. This would be particularly noticeable during the two week deer hunting season when existing use is concentrated. However, an increase of 600 visitor days of non-motorized use, hunters utilizing cherry stemmed roads and boundary roads to gain access for foot travel, would result in slight impacts on solitude as a result of the congested use during the hunting season.

As a result of precluding the prescribed burn, timber harvest, and fuelwood cutting the existing level of solitude would be retained and slightly enhanced.

Continued maintenance of the 19 existing livestock reservoirs and 4 1/2 miles of fence would result in only localized negligible impacts on solitude when maintenance actually occurs as described under the Proposed Action.

- Primitive and Unconfined Recreation

Closure of the WSA to motorized recreation would result in a slight increase in opportunities for primitive and unconfined recreation. These opportunities would also be further enhanced by precluding timber harvesting although only 300 acres on the upper slopes of the Tule Mountain surrounding and including the harvest area would be affected.

The prohibition of the prescribed burn would result in precluding the potential benefit of creating additional access through dense big sage areas.

-Special Features

There are no special ecological, geological or special features within the Tule Mountain to benefit from the protection offered by wilderness designation.

Conclusion

Wilderness designation would have a slight positive benefit to wilderness values. As a result of precluding existing motorized recreation use as well as the projected prescribed burn for increased livestock use, timber harvesting, and fuelwood cutting wilderness values would be retained and slightly enhanced, particularly naturalness and solitude. Additionally, long-term protection from unanticipated future actions that could result in potential adverse impacts would be provided.

Impacts on Motorized Recreation Use

The entire 16,950 acres within the WSA would be closed to motorized recreation use. Wilderness designation would result in the closure of 20 miles of primitive vehicle routes and the elimination of 1,100 visitor days of motorized recreation use. Vehicle access for deer hunting amounts to 1,000 of these vehicle days. It is anticipated that approximately 600 of these visitor days would continue to use the WSA as non-motorized recreation use with the boundary roads and six miles of cherry stemmed roads providing vehicle access. Other public lands throughout the Alturas Resource Area offers similar motorized recreation opportunities including hunting which could accommodate the use displaced from the WSA. Therefore, only minor impacts are projected as a result of closing the WSA to motorized recreation use.

Conclusion

Motorized recreation use totalling 1,100 visitor days would be foregone. This would result in a minor impact as the WSA would continue to have vehicle access, particularly for hunting, available around the perimeter from boundary roads and from six miles of cherry stemmed roads which penetrate the central portion of the WSA.

Impacts on Livestock Grazing and Range Improvements

Wilderness designation would preclude a proposed 2,000 acre prescribed burn within the WSA. An increase of 66 AUMs would be foregone, as livestock grazing would remain at the current allotted level of 2.750 AUMs. The proposed increase amounts to less than a three percent increase. Current livestock grazing operations would not be dependent on this increase. Maintenance of existing livestock facilities including 19 reservoirs and 4 1/2 miles of fence would continue. No other projects are anticipated. There would be a slight impact on livestock grazing and range improvements.

Consequences

Conclusion

An increase of 66 AUMs or less than three percent of the current 2,570 AUMs allotted within the WSA would be foregone as a result of precluding a proposed 2,000 acre prescribed burn. This would result in a slight impact on livestock grazing and range improvements.

Chapter 5

Consultation & Coordination

CHAPTER 5

CONSULTATION AND COORDINATION

OVERVIEW OF THE PROCESS

The planning/EIS process leading up to the Final EIS has included numerous opportunities for public involvement.

Consultation and coordination with the public and governmental agencies was a planned and integral part of the development of the management alternatives analyzed in the draft and final EIS.

Following is a summary of the consultation, coordination, and public participation in the EIS process:

- A Notice of Intent to prepare the Alturas Resource Area Management Plan/EIS was published in Federal Register on February 1, 1980 and filed with the California State Clearinghouse.
- Preplanning analysis completed. Available for public review in April, 1980.
- Public meetings were conducted on March 18 and 19, 1980 in Susanville and Alturas to identify significant issues to be addressed in the planning process.
- Issues consolidated and distributed for public comment on January 6, 1981.
- Newsletter outlining planning process published and distributed to the public in August, 1981.
- Newsletter identifying planning criteria was published and distributed to the public in September, 1981.

Oral as well as written comments received throughout the planning process were used in the final development of alternatives analyzed in the Draft EIS. These comments are on file and available for public review in the BLM Susanville District's Alturas Resource Area Office.

The Draft EIS was filed with the Environmental Protection Agency (EPA) and their notice of availability published on April 15, 1983. Additionally, on April 13, 1983, BLM published a Notice of Availability for the Draft EIS in the Federal Register.

A 90-day public comment period was given ending July 15, 1983.

The Wilderness Public Hearing Notice was published in the Federal Register on April 20 and April 28, 1983.

The Final Alturas Resource Management Plan and Environmental Impact Statement was published on November 2, 1983.

A 30-day public comment period was given ending December 5, 1983.

SUMMARY OF PUBLIC COMMENTS

A total of 67 comments were submitted, both oral and written, on the Alturas Resource Area draft resource management plan and environmental impact statement during the 90-day public comment period which ended July 15, 1983. Of the 68 comments, 55 made some reference to the wilderness portion of the RMP. A formal public hearing was held on May 23, 1983, in McArthur, California. The hearing was announced through a news release, personal communication and in the Federal Register on April 20, 1983.

Of the total of 55 written and oral comments received for the record, four indicated approval of the BLM DEIS Preserved Alternative in whole or part. Forty-seven recommended All Wilderness Alternative. One response recommended the No Wilderness Alternative. Two comments proposed boundary modifications for the Pit River Canyon WSA. One comment took no position but questioned the overall adequacy of the entire document including wilderness.

Most of those favoring wilderness designation believed there are not enough areas being protected to preserve their wilderness values. Following are the more common reasons given n support of wilderness designation for the Pit River Canyon and Tule Mountains WSAs: It will provide maximum protection of vegetation, including riparian areas; it provides habitat for mammal and raptor species; archaeological sites will be protected; lack of resource conflicts; the areas add diversity to the California Wilderness System; and it preserves primitive recreational opportunities.

Those supporting BLMs preferred alternative believe the concerns for resources, local economic, and wilderness are in proper balance.

No comments on the draft EIS were received from other government agencies which pertained to wilderness.

Summary of Public Comments

	TOTAL COMMENTS RECEIVED	SUPPORTS MORE WILDERNESS THAN DEIS PREFERRED ALTERNATIVE	SUPPORTS DEIS PREFERRED ALTERNATIVE	SUPPORTS LESS WILDERNESS THAN DEIS PREFERRED ALTERNATIVES	NO POSITION
ORAL	2	2 (100%)	0	0	0
WRITTEN	53	47 (89%)	4 (7%)	1 (2%)	1 (2%)
TOTALS	55	49 (89%)	4 (7%)	1 (2%)	1 (2%)

CONSULTATION WITH OTHER AGENCIES

Consultation and coordination on Threatened and Endangered Species was achieved by comparing the resource data on species occurring in WSAs against the Fish and Wildlife Service and California Native Plant Society's published list of Threatened, Endangered and Sensitive Species. The coordination also included sending the Fish and Wildlife Service and the California Native Plant Society copies of the Draft EIS. Additionally, the U.S. Fish and Wildlife Service has commented that Section 7 consultation need not be initiated in response to wilderness recommendations. However, formal consultation should be initiated prior to on-the-ground implementation of activities which may affect threatened or endangered species. (See Appendix for correspondence between the BLM and FWS.)

Consultation and coordination with the California State Historic Preservation Office was accomplished through the review of the Alturas Resource Area Management Plan (RMP). Eligibility and designation of National Register Quality sites in the Pit River Canyon WSA is currently being pursued.

CONSISTENCY WITH LOCAL LAND USE PLANS

There is very little in the way of local land use plans that are affected by designation or nondesignation of both Pit River Canyon or Tule Mountain WSAs. The Lassen County General Plan shows both WSAs in the General Forest Environmental Classification. Two of the goals for this classification that would apply are:

"1. Protection and appropriate use of the county's natural beauty and wilderness character.

4. Improvement and diversification of the livestock and other agricultural industries."

A wilderness designation would be compatible with goal number 1 and a nonsuitable recommendation would be compatible with goal number 4. There was no specific mention in the land use plan of whether there should be or shouldn't be any further wilderness in the county.

The Lassen County Board of Supervisors passed a resolution several years ago which stated they did not want any more wilderness designated in Lassen County.

DISTRIBUTION OF THE DRAFT EIS

Requests for comments on the DEIS were made of the following interest groups and agencies: (An asterisk indicates those who responded to the DEIS.)

CONGRESSIONAL

California

Norman Shumway
Alan Cranston
Pete Wilson
Ray Johnson
Stan Statham

GOVERNMENT

Federal

Department of Agriculture
- Forest Service, Lassen National Forest *
- Forest Service, Modoc National Forest *
- Soil Conservation Service

Department of the Interior
- Bureau of Mines
- Bureau of Reclamation *
- Geological Survey
- Fish and Wildlife Service
- Bureau of Indian Affairs *
- Heritage Conservation and Recreation Service
- National Park Service *

U.S. Environmental Protection Agency
Federal Aviation Administration
Advisory Council on Historic Preservation
North Cal-Neva RCD

State

California Department of Fish and Game *
California State Historic Preservation Officer *
California Division of Forestry
Lahontan and Sacramento Regional Water Quality Control Boards
Native American Heritage Commission
California Department of Water Resources

County

Lassen County Supervisors
Lassen County Planning Commission
Lassen County Extension Agent
Modoc County Supervisors
Modoc County Planning Commission
Modoc County Extension Agent
Modoc County Road Department
Lassen County Agricultural Commission
Lassen County Road Department
Modoc County Agricultural Commission

INTERESTED GROUPS/ORGANIZATIONS

Environmental

National Resources Defense Council *
Sierra Club - Reno - Sacramento *
Wilderness Society - Reno *
Northern California Wilderness Coalition *
California Native Plant Society
Northeast Californians for Wilderness *

Historical, Archaeology

Native American Heritage Advisory Committee (Susanville)
Lassen County Historical Society
Modoc County Heritage Society

Livestock

California Cattlemen's Association *
Modoc County Cattlemen's Association
Lassen County Cattlemen's Association
District Grazing Advisory Board
Alturas Resource Area Operators
Modoc Grazing Advisory Board
Fall River-Big Valley Cattlemen's Association *

Mineral

Lakeview Gem and Mineral Society
Lassen County Mineral and Gem Society
Modoc Gem and Mineral Society

Recreational

Hot Wheels 4X4 Club
Glass Mountain Four-Wheelers
Ed Crawford, NOLOC
Lassen Motorcycle Club

Forestry

Paul Bunyan Lumber Company
Collins Pine Company
Roseburg Lumber Company
Main Industries Inc.
Coin Lumber Company
Publishers Forest Products
Pasternak Logging
Sierra Pacific Industries
Surprise Valley Lumber Company
Goose Lake Timber Company

University

Jim Linebaugh, University of Nevada
Jim Clawson, University of California
Dick Ekhart, University of Nevada
Wayne Burkhardt, University of Nevada

Wild Horses and Burros

Wild Horse Organized Assistance
International Society for the Protection of Wild Horses and Burros

Wildlife

Defenders of Wildlife *
Lassen County Fish and Game and Recreation Commission
Lassen Organized Sportsmen
Eagle Lake Audubon
Lassen Fin and Antler Club
Modoc Rod and Gun Club

Other

Chambers of Commerce
Calandar Pine Corporation
Citizens Utilities
Edgerton Lumber
Farm Bureau
Garden Club
Modoc County Sportsmen
Pit River Home and Agricultural Association
Pit River Tribal Council
Pacific Gas and Electric Company *
Public Lands Council
Rod and Gun Club
Rotary International
Surprise Valley Electric

PUBLIC COMMENTS ON THE DRAFT EIS

Comment letters included in this Final EIS for the Alturas Resource Area's wilderness recommendations were extracted from the comment letters received in response to the Draft Alturas RMP/EIS which included wilderness.

A total of 65 interested citizens, federal and state agencies, and private organizations submitted comments on the Draft Alturas RMP/EIS as of July 15, 1983. All letters were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the DEIS. Substantive comments which presented new data, questioned facts and or analyses, or commented on issues bearing directly on the DEIS or the environmental impacts of the alternatives were fully evaluated and given responses. Changes or additions have been incorporated into this final statement.

The letters and responses were then published in the Final Alturas RMP/EIS on November 2, 1983. Fifty-three of these letters were written comments addressing the Wilderness Study Areas, and two oral comments were received at the wilderness hearing on May 23, 1983.

Extracted from the letters received on the entire land use plan, are 18 letters that directly address the adequacy of wilderness. These letters are published in this document with direct responses to the wilderness comments. For responses to comments in these letters that relate to management of areas outside the WSAs refer to the Final RMP/EIS.

Thirty of the letters received on the Draft RMP/EIS recommended a specific wilderness alternative, but did not question the adequacy of the EIS. These comments have not been printed in this document.

This Draft EIS analyzed four alternatives including the Proposed Action selected for study in the Draft Alturas RMP which included the Pit River Canyon WSA and Tule Mountain WSA. In the final EIS two of the No Wilderness Alternatives (Maximum Protection Alternative and Continue Present Management Prescribed in the Previous MFP Alternative) for each of the WSAs have been dismissed from consideration since they considered management that have been superseded by the approved Alturas RMP.

The following summarizes both publish and non-published wilderness comments from the Draft EIS.

- 45 comments recommended All Wilderness.

- 4 comments recommended Partial Wilderness.
    - 2 addressed the Pit River Canyon WSA.
    - 2 addressed the Tule Mountain WSA.

- 1 comment recommend the Maximum Production Alternative for the Pit River Canyon WSA.

- 2 comments proposed a new alternative (ACEC) for the Pit River Canyon WSA.

- 1 comment took no position but discussed the adequacy of wilderness.

The oral comments received at the wilderness hearing have been printed and summarized in the Wilderness Study Report.

Comments and related responses are identified by the number of the comment letter and the number of the comment in that letter. Comment letters are arranged by agencies (Federal, State, and local), organizations, and individuals.

INDEX OF WRITTEN COMMENTS AND RESPONSES

Federal Agencies

Letter No. 1 - U.S. Environmental Protection Agency
Letter No. 2 - U.S.D.A. Forest Service, Modoc National Forest

Local Agencies

Letter No. 3 - Lassen - Plumas Counties

Organizations

Letter No. 4 - California Cattlemen's Association
Letter No. 5 - California Wilderness Coalition
Letter No. 6 - Defenders of Wildlife
Letter No. 7 - Fall River-Big Valley Cattlemen's Association
Letter No. 8 - Natural Resources Defense Council, Inc.
Letter No. 9 - Northeast Californians for Wilderness
Letter No. 10 - Sierra Club, Mother Lode Chapter
Letter No. 11 - Wilderness Society

Individuals

Letter No. 12 - Atlantic Richfield Company
Letter No. 13 - Dahle Brothers
Letter No. 14 - Ron Guenther
Letter No. 15 - Minerals Exploration Coalition
Letter No. 16 - Pacific Gas and Electric
Letter No. 17 - Curtis Spalding
Letter No. 18 - Thomas and June Vestal

1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Mr. C. Rex Cleary, District Manager
Susanville District Office
Bureau of Land Management
P.O. Box 1090
Susanville, California 96130

JUL 13 1983

Dear Mr. Cleary:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled ALTURAS RESOURCE MANAGEMENT PLAN; LASSEN AND MODOC COUNTIES, CALIFORNIA. We have no comments on this DEIS.

We have classified this DEIS as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send two copies of the Final Environmental Impact Statement to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr,
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosure (1)

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

2

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Modoc National Forest
P.O. Box 611
Alturas, California 96101

1920
JUL 12 1983

Bureau of Land Management
C/O Rich Drehöll
Alturas Resource Area
P.O. Box 771
Alturas, CA. 96101

Dear Rich,

Following are comments received from Modoc National Forest Personnel on your Draft EIS and RMP for the Alturas Resource Area.

1. District Ranger, Devil's Garden - Could see no conflicts between BLM preferred alternative and FS management objectives.

2. Forest Archeologist - "Basically, all alternatives must continue protection of cultural resource values as provided by law - anything less would not be legal".

2-1 3. Asst. Forest FMO - "The vegetation on a large portion of BLM lands in the Alturas Resource Area is dependent on fire to maintain an ecological balance. The BLM has recognized this in recent years and has become fairly active in vegetation management through the use of fire management. Therefore, it concerns me that this important management program is not mentioned in the DEIS".

If there are any other comments forthcoming, they will be forwarded to you immediately.

Sincerely,

Nancy Gardner
for GLENN BRADLEY
Forest Supervisor

Response to Letter No. 2

Response 2-1

Wilderness designation permits the use of prescribed fire as a management tool to maintain the ecological balance within a fire dependent ecosystem. However, no areas were identified within either the Pit River Canyon WSA or the Tule Mountain WSA that would be appropriate for this type of management. A prescribed burn for increasing livestock forage is proposed for the Tule Mountain WSA under the Proposed Action. However, this is not being done within a fire dependent ecosystem. Under burning of decadent browse in the Tule Mountain WSA was considered for improving wildlife browse condition in the RMP/EIS but has subsequently been determined to be potentially detrimental in the Great Basin vegetative community. Therefore, burning the decadent browse has been dropped as a management action in the FEIS.

LASSEN-PLUMAS COUNTIES
ALCOHOL and DRUG DEPARTMENT

JIM MAHAN
Administrator

July 12, 1983

Dear Sir:

This letter is intended as a written comment upon the proposed Resource Management Plan for the Alturas Resource Area, 1792 (C-020).

It appears that the four alternative plans have been well researched. The proposed alternative though much of it is the same as Alternative II, is not as balanced between production and protection. One can look at the first page of the cumulative summary and so that the Preferred Alternative is almost the same as the Maximize Production Alternative. For me this is not balanced enough. I am in favor of further protection of public land resources.

For example, the use of range land is a critical issue in preservation. Any substantial increase in grazing and fencing would disturb and degrade the natural and cultured values of the area. The increase of production and commercial use, will have unavoidable adverse impacts of wildlife, habitat degradation, deterioration of riparian & meadow habitat and an overall acceleration of the depletion of cultural resources.

3-1 Secondly, I am concerned that critical natural areas like the Pitt River study area, South Warner contiguous areas and the Tule Mountain area are woefully neglected for adequate consideration in the National Wilderness system. Because of its importance for raptor habitat, the entire Pitt River area should be recommended for inclusion in the wilderness system. Other advantages can be stated for the inclusion of the other two roadless areas under consideration within this overall resource plan. The report mentions 3 separate areas of sensitive plants that occur in the Tule Mountain MA. These are, important items that further sway my decision toward further protection rather than more production and hence degradation.

RECEIVED
SUSANVILLE DIST.
JUL 13 1983

ACTION | NOTIFYING & INFORM
DIST MGR
ASST DM
SECT
PLS & ENV
PAS
RESOURCE
ADMIN
OPER
CARTLE LAKE OFFICE
ALTURAS OFFICE
CEDARVILLE OFFICE

1 Information
2 Read & Log
3 Prepare Reply
4 Review & Interpret
5 Comments
6 See me
7 File
8 Send Copy

ARCH
FORESTRY
MINERALS
RANGE
REALTY
RECREATION
T & E
WATERSHED
WILDERNESS
WILDLIFE

476 ALEXANDER AVENUE
SUSANVILLE, CA 96130
(916) 257-8311, EXT. 195

314 JACKSON STREET
QUINCY, CA 95971
(916) 283-0251

VETERANS MEMORIAL BLDG.
MAIN STREET, SUSANVILLE
(916) 257-8311, EXT. 199

Many specific concerns could be culled from the report but the overall view I take is that the preferred alternative is not acceptable to me or perhaps others as well. I support Alternative III as a more balanced option, that puts protective ahead of short term production gains and thereby keeping much of our pristine resources intact. A final word on the mitigation measures that are intended to lessen the adverse impact of alternatives one and two. The measures may help alleviate some harm to the resources but increases in livestock use allotments and aerial spraying for vegetation treatment are not things I would support as being beneficial, especially if one is to maintain high water quality. Recent community action against the aerial spraying of herbicides like 24-D control suggests a "growing" trend toward public concern over assumed safe practices of natural forests and BLM management where water quality and health is at stake. Your mitigative measure no. 7 could turn out to be a bigger adverse impact unless you leave more areas unsprayed than you planned.

Sincerely,

Ann C. Baker R.S.

Response to Letter No. 3

Response 3-1

The FEIS recognizes the raptor habitat within the Pit River Canyon as a special feature of the WSA. The impacts of the various management actions are assessed in Chapter 4 - Environmental Consequences. Under the Proposed Action (Partial Wilderness) this habitat would be slightly enchanced.

The Tule Mountain Management Area identified in the RMP/EIS contains 205,000 acres of public land. The Tule Mountain WSA consisting of 16,950 acres is but a portion of the entire management area. The three separate sensitive plant areas that are referred to do not include the Tule Mountain WSA. There are no threatened and endangered plants or other sensitive plants known to occur within the WSA.

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate EIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

CALIFORNIA CATTLEMEN'S ASSOCIATION 4

H. CLAY DAULTON
PRESIDENT
MADERA

JOHN LACEY
1ST VICE PRESIDENT
PASO ROBLES

WM. B. STAIGER
EXECUTIVE VICE PRESIDENT

JAKE L. SCHNEIDER
TREASURER
SLOUGHHOUSE

TELEPHONE 444-0845 (AREA CODE 916)
1005 12TH STREET, SUITE A
SACRAMENTO, CALIFORNIA
ZIP CODE 95814

VICE PRESIDENTS
JIM TIMMONS
ARCATA
STUART BROWN
GUSTINE
MYRON OPENSHAW
OROVILLE

#9

NCA
NATIONAL CATTLEMEN'S ASSOCIATION

July 19, 1983

Rich Drehobl, Area Manager
Bureau of Land Management
P.O. Box 771
Alturas, CA 96101

Dear Mr. Drehobl:

The CCA would like to go on record in support of the recommendation from the Fall River-Big Valley Cattlemen's Association that the proposed Pit River Canyon Wilderness area be confined to the Pit River Canyon and Horse Creek Canyon. We respectfully request that the surrounding table-
4-1 lands and other elevations above the rim of these canyons be excluded from the wilderness area boundary.

Any expansion of this proposed wilderness area into adjacent grazing areas would be detrimental to the agricultural economy of the area and make management of the wilderness area much more difficult and expensive.

Cattle theft is a major problem along isolated roads throughout this region and for this reason we would urge that the BLM choose access road locations that will minimize public exposure to areas frequented by cattle grazing.

Sincerely,

Wm. B. Staiger

Wm. B. Staiger
Executive Vice President

cc: Ed Hastey
Ted Crum
Steve Albaugh
Tom Vestal
Phillip Lord

ldc

Response to Letter No. 4

Response 4-1

The Bureau of Land Management's Wilderness Management Policy incorporates the language of the House Report 96-1126, which emphasizes that Section 4(d)(4)(2) of the Wilderness Act provides for the continuation of grazing in areas where this use occurred prior to wilderness designation. In addition, wilderness management would allow development of livestock grazing facilities necessary for the protection of rangeland and/or wilderness resources and the effective management of these resources. However, improvements for the purpose of increased or more intensive livestock use would not be permitted. Chapter 2 of the FEIS includes projected grazing management action for the Proposed Actions and alternatives for each WSA.

California Wilderness Coalition

POST OFFICE BOX 429 • DAVIS, CALIFORNIA 95616 • (916) 758-0380

July 11, 1983

C. Rex Cleary, District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, CA 96130

Dear Rex:

The California Wilderness Coalition is pleased to have this opportunity to comment on the Resource Management Plan and Environmental Impact Statement (EIS) for the Alturas Planning Area.

On the whole, we are quite disappointed with the EIS sent for review. There is very little information given about wildlife, wilderness, and plant resources. The range of alternatives is quite narrow and heavily slanted towards increased grazing. It is clear that the cow comes before all other resources in the Alturas Resource Area.

We always are surprised to see the labels used by the Bureau of Land Management on their alternatives. The choices - "Maxamized Production," "Balanced," and "Maximized Protection" are very misleading. If anything, Alternative III is a "balanced" alternative. If you were really proposing to maximize protection, there would be an alternative with no grazing, no timber harvesting, no off-road vehicles, and especially no sales of public lands. The spectrum of management alternatives is much broader than those offered in the EIS.

The California Wilderness Coalition's specific comments on the management plan and EIS are as follows:

RANGE

With more than 60 percent of the surveyed range in poor or fair condition, we cannot understand how the Bureau of Land Management can propose increasing grazing in most of their management areas.

The proposed alternative calls for vegetation treatment to increase the quantity of livestock forage, but just what this treatment is and its environmental impacts are not discussed in the EIS. Merely mentioning that some areas will be treated by prescribed burn or aerial spray application does not allow the reader to determine the impact of these proposed actions.

WILDLIFE

The authors of the EIS seem to confuse "wildlife" with "game species." While the discussions of mule deer, pronghorn, and sage grouse are useful, our experience in the Alturas Planning Area shows there to be quite a variety of wildlife present. Only one sentence mentions the approximately 225 species of birds and numerous mammals, reptiles, and amphibians that bring the total wildlife species count to over 300. The EIS must analyze the impact of the proposed actions on more than just a few game species. This is especially true since there are endangered southern bald eagles in the area and other sensitive species like Swainson's hawk.

It appears that the proposed action will be disastrous for many of the three hundred species of wildlife in various parts of the resource area. The EIS should

specifically state what these impacts will be, what the loss of wildlife will be, and if mitigation measures are possible. Clearly, the cost of maintaining and increasing grazing will be a major change in the ecologic diversity of the resource area.

TIMBER

With less than two percent of the resource area supporting marginally commercial timber, the California Wilderness Coalition suspects that the costs of timber sale preparation, road construction, and reforestation will far exceed any money received from timber sales. We feel the EIS should address this issue as well as the impacts of logging the relatively small forests on wildlife, soils, rare plants, etc.

WILDERNESS

5-1 We trust that this EIS for the Resource Area is not intended to comply with the requirements of Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) for a complete wilderness study and EIS for the Wilderness Study Areas (WSA) present. The EIS is not adequate even for the Resource Managemen Plan, and it certainly does not begin to consider the wilderness alternatives for the three WSAs in the area.

The California Wilderness Coalition strongly opposes the preliminary wilderness recommendations of the Bureau of Land Management in the Alturas Resource Area.

We feel that a Pit River Canyon Wilderness of about 15,000 acres should be recommended as suitable (the existing WSA along with lands erroneously dropped during the intensive wilderness inventory). The entire Tule Mountain WSA of 16,950 acres also should be recommended as suitable, along with the 4,000 acres of public land adjacent to the exisiting South Warner Wilderness.

5-2 The proposed alternative does propose a small wilderness for the Pit River Canyon, but this proposal would protect just the canyon itself without any of the surrounding lands. Additional diversity, special features, wildlife, and plant communities would be preserved by adding the remainder of the WSA and additional lands to the north.

The Tule Mountain WSA is a large area of vegetation types not represented in California's portion of the National Wilderness Preservation System. We were not aware that the Wilderness Act of 1964 or FLMPA requires a "high quality" wilderness area (EIS, page 3-35), or just exactly what a "high quality" wilderness area is.

5-3 The wilderness management rationale in the EIS is that Tule Mountain is being recommended as nonsuitable because it does not add to the diversity of the National Wilderness Preservation System. What similar areas are in the wilderness system? It also is stated that private inholdings and numerous ways make manageability very difficult; less than six percent of the land is private, and a partial wilderness alternative could mitigate part of this problem. Perhaps the most incredible rationale offered is the commercial timber. Only 105 acres of white fir and Jeffrey pine, which are found at the top of Tule Mountain could be considered commercial, along with just 46 acres that requires timber site planting. This minuscule amount of timber land, less than one percent of the WSA, is surely uneconomical to manage as commercial timber.

With virtually no mineral or timber resources in the WSA, there does not seem to be any basis for the nonsuitable recommendation by the Bureau of Land Management. "Decadent browse" can be managed through prescribed burning, and the range can be improved through wilderness management.

5-4 We are quite confused about the Bureau of Land Management's plan for the East Warners. On page 2-39 of the EIS it is stated that these lands contiguous to the South Warner Wilderness were considered nonsuitable, but on page 3-37 it says that decisions for this management area will be incorporated into the Cowhead/Massacre Management

5-4 cont. Framework Plan. Why isn't the decision deferred until the Cowhead/Massacre plan is reconsidered?

LAND SALES

The California Wilderness Coalition completely opposes the proposal to sell portions of the Alturas Resource Area. With the significant amount of private inholdings throughout the area, the best use of these tracts would be for exchange to make the remaining public lands more manageable. Also, no lands with important wildlife or plant habitat should be sold.

The proposal to sell parts of the East Warners WSA is unconscionable, not to mention illegal.

CONCLUSION

Aside from the California Wilderness Coalition's objections to the decisions proposed in the Alturas Resource Area Resource Management Plan, the Environmental Impact Statement is wholly inadequate. The EIS fails to be site specific, ignores potential impacts, and fails to address many issues, especially wildlife.

The management plan completely fails to adequately consider the Wilderness Study Areas in the resource area. An EIS for the WSAs requires much more detailed discussions of the affected environment, evaluations of wilderness values and manageability, environmental consequences, and a full range of alternatives. This EIS does not begin to address these issues.

Sincerely,

Jim Eaton

Jim Eaton
Executive Director

Response to Letter No. 5

Response 5-1

The FEIS for the Alturas Resource Area wilderness recommendations has been reformatted to present all information including identification of issues, management actions, for each alternative, descriptions of the affected environment, and an analysis of the environmental impacts on a WSA by WSA basis. Additional information specific to each WSA has been added to the FEIS. The discussion of manageability has been eliminated from the FEIS. Information concerning manageability will be evaluated in the Wilderness Report.

Response 5-2

The Proposed Action for the Pit River Canyon has been expanded to include additional lands in the upland portion of the WSA above the Canyon rim. The boundary of the area recommended as suitable for wilderness designation now follows watershed divisions and other topographic features. See page 10 for a description of the Proposed Action and Map-2 on page 15.

Response 5-3

The wilderness values are discussed in Chapter 3 and include naturalness, solitude, primitive and unconfined recreation, and special features. The impacts of the management actions identified in Chapter 2 including timber harvesting on wilderness values are assessed in Chapter 4 - Environmental Consequeness. Additionally, the impacts of wilderness designation on activities considered to be an issue for detailed analysis are assessed. The discussion of diversity in the National Wilderness Preservation System, geographic distribution of wilderness areas and availability of wilderness to Standard Metropolitan Statistical Areas (SMSAs) has been eliminated from the FEIS. The FEIS deals specifically with the environmental impacts of the Proposed Action and alternatives for each WSA. The Wilderness Study Report will discuss the aspects of diversity, geographic distribution, and availability of wilderness areas as well as manageability.

Response 5-4

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate EIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

Defenders
OF WILDLIFE

6

July 14, 1983

Mr. Richard J. Drehobl
Alturas Resource Area Manager
U.S. Bureau of Land Management
Centerville Road, P.O. Box 771
Alturas, CA 96101

Dear Mr. Drehobl:

Defenders of Wildlife submits this letter as our comments and recommendations on your draft plan for the Alturas Resource Area in Modoc and Lassen counties.

We are generally disappointed with the inadequate wilderness recommendations and the proposal to sell over 20,000 acres of public land. For example, with 32,625 acres of roadless land in the planning unit, BLM is only recommending 5,880 acres of the Pit River Canyon WSA as suitable for wilderness. While we support this modest 5,880-acre wilderness recommendation, we believe that BLM has ignored the magnificent natural values and opportunities for solitude in the remaining roadless lands.

6-1 We urge BLM to support additional wilderness protection, and recommend as suitable for wilderness: the entire 11,675-acre Pit River Canyon WSA; the 16,950-acre Tule Mountain WSA; and the 4,000 acres adjacent to the existing South Warner Wilderness. Where grazing occurs, we also wish to reinforce the obvious importance of protecting key riparian habitats.

Thank you very much for considering our views, and please send a copy of the final plan.

Sincerely,

Richard Spotts

Richard Spotts
California Field Representative
Defenders of Wildlife

5604 Rosedale Way
Sacramento, CA 95822
(916) 442-6386

RS/bc

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Response to Letter No. 6

Response 6-1

Revision of the Proposed Action (Partial Wilderness) provides for acquisition of 740 acres within the proposed Pit River Canyon WSA (see Map-2, page 15). The area recommended as suitable for wilderness designation has also been expanded to include 6,640 acres of public lands as described under the Proposed Action (Partial Wilderness) on page 10.

The East Warners Contiguous area (CA-020-708) will be analyzed in the separate FEIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

FALL RIVER - BIG VALLEY CATTLEMEN'S ASSOCIATION
Post Office Box 66,
McArthur, CA 96056

July 14, 1983

Rich Drehobl, Area Manager
Bureau of Land Management
P. O. Box 771
Alturas, California 96101

Dear Mr. Drehobl:

Attached is a copy of our October 14, 1982, letter addressed to your office. Our members have ranches on all sides of the proposed Pit River Canyon Wilderness. We reaffirm our recommendation that the wilderness area be restricted to Pit River and Horse Creek Canyon as much as possible.

The proposed wilderness area should be evaluated on the basis of the two canyons themselves. We feel that the proposed wilderness area boundaries should include very little of the surrounding tablelands and elevations so nearby private and public land can continue to be used in a productive manner. Further, clearly defined boundaries near the canyon rim will enable more efficient and economical enforcement of wilderness regulations by BLM. 7-1

We want to see the BLM minimize conflicts between wilderness and production interests in the proposed wilderness area. This can be best accomplished by not including in the wilderness area: 1) land with established irrigation systems, 2) areas where access to private land is reduced, and 3) large grazing areas.

Cattle theft is a major problem along isolated roads in this area. We would like the BLM to choose access road locations that minimize public exposure to areas frequented by grazing cattle.

Please send me a copy of the draft document when it is complete.

Sincerely,

Ted Crum
President

cc: Bill Staiger

Response to Letter No. 7

Response 7-1

Your comments have been considered. However, wilderness designation would not preclude livestock grazing (see Response 4-1 for Comment Letter No. 4). The boundaries of the upland portion of the WSA have been modified to follow watershed division and other topographic features. Refer to Map-2, page 15, for the boundaries of the Proposed Action (Partial Wilderness) for the Pit River Canyon WSA.

Natural Resources Defense Council, Inc.

25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

Washington Office
1725 I STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006
202 223-8210

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

8

July 15, 1983

C. Rex Cleary
District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, CA 96130

Dear Rex:

Enclosed are NRDC's comments on the Alturas draft RMP/EIS. We believe the document suffers from a number of serious deficiencies. Some of these may have resulted from a lack of resources or other constraints beyond your control. Even so, because this is the first RMP to be prepared in California, it is particularly important to conduct an adequate environmental analysis and to develop a meaningful land use plan that complies with legal requirements. The Alturas draft RMP/EIS fails to do so and should therefore be revised, supplemented and circulated for additional public comment.

I would like to thank you and your staff, particularly Rich Drehobl, for your help and for allowing us several additional days to submit our comments. My visit to Alturas was also very helpful in preparing these comments. I hope these comments are useful to you and will improve the planning process in the Alturas area.

Sincerely,

David

David B. Edelson

DBE:klw
Enclosure

cc: Richard Drehobl (with attachment)

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Natural Resources Defense Council, Inc.

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July 15, 1983

C. Rex Cleary
District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, CA 96130

Re: Alturas Draft Resource Management Plan
Environmental Impact Statement

Dear Rex:

I have reviewed the Alturas draft RMP/EIS carefully and submit these comments on behalf of the Natural Resources Defense Council, Inc.

Overall, the document is a major disappointment. Although it contains some specific proposals that address existing problems of range and wildlife management, it contains very little information and virtually no constraints or guidelines with respect to timber and minerals management or land disposal. In this respect, the document resembles a grazing EIS that has been expanded to include headings for timber, minerals, wilderness, etc. However, the draft contains nowhere near the detail and information with respect to those resources and activities as it does with respect to range management. Thus, it fails to provide necessary inventory information or to establish meaningful goals, guidelines, and constraints for future management of activities other than livestock grazing, as required by the Federal Land Policy and Management Act (FLPMA) and the planning regulations.

8-1 The document also fails to comply with the full environmental disclosure requirements of the National Environmental Policy Act (NEPA). The description of wildlife

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8-1 cont.

habitat, wilderness study areas, and other resources lacks sufficient detail to identify specific resource and management problems or assess proposed solutions to those problems. The environmental impact analysis of all proposed actions is extremely conclusory and fails to substantiate predicted impacts or explain how the conclusions were derived. The alternatives presented often fail to include a broad range of choices. Particularly because this is the first RMP/EIS to be prepared in California, we strongly urge you to prepare and circulate for public review a revised or supplemental draft that remedies these and other deficiencies outlined below.

I. Range Management

The range management proposals and alternatives fail to comply with the basic requirements of the National Environmental Policy Act (NEPA), as set forth in the court's opinion in NRDC v. Morton, 388 F. Supp. 829 (D.D.C. 1974), applicable regulations, and elsewhere. The EIS lacks necessary grazing capacity and other information, adequate environment impact analysis, and sufficiently detailed proposals. Moreover, the preferred alternative does not satisfy the Bureau's substantive obligation, as set forth in the Taylor Grazing Act, FLPMA, and the Public Rangelands Improvement Act (PRIA) to protect and improve resource conditions.

The document's failure to set forth estimates of existing and potential grazing capacity of each allotment is a critical flaw. The Bureau is required by the Taylor Grazing Act, FLPMA, PRIA, and its own regulations to ensure that authorized grazing use does not exceed an area's grazing capacity. See, e.g., 43 C.F.R. §§ 4100.0-2, 4110.3-2(b), 4120.2-1(a) (1982). Accordingly, the agency must analyze grazing capacity in EISs in order to allow both the public and decision-makers to determine how much grazing, if any, should be allowed in a given area, and how grazing should be managed. Without this information, the Bureau will be unable to make land use planning decisions that

will prevent overgrazing and resulting resource deterioration. Similarly, without specific estimates of potential grazing capacity the agency cannot properly establish in the land use plan constraints and limitations on future grazing use, as required by its regulations. See 43 C.F.R. § 1601.0-5(k)(2), (4) (1983).

The EIS also lacks comprehensive soils and vegetation data. The document states that "some sites exhibit accelerated [soil] erosion" (p. 3-13) but fails to identify any such sites or describe the data upon which this conclusion was based, even though the data are apparently available. There is no description at all of soil and watershed conditions in the discussion of most of the management areas. (pp. 3-23 to 3-28, 3-30 to 3-38.) In addition, the EIS provides ecological range condition data for a number of allotments (Table 3-1) but fails to provide such data for many other allotments.[1/] This information is necessary in order to determine existing resource problems and assess proposed solutions to those problems. Thus, the EIS fails to describe adequately the affected environment and to provide information needed to support proposed management actions and substantiate predicted impacts, as required by NEPA.

The lack of sufficient range condition and grazing capacity data makes it impossible for readers to assess the M-I-C categorization decisions set forth in the document. Such information is necessary to determine whether an allotment satisfies particular categorization criteria, including whether present range condition and present management are "satisfactory"

1/The Bureau also does not identify when such data were obtained or describe the techniques used to acquire the data. Nor does the EIS describe in any detail the various types of climax plant communities used to assess existing conditions in particular areas. See Appendix A.

or "unsatisfactory," whether areas have low, moderate, or high production potential, and whether they are producing near that potential. (pp. 2-42, 2-43.) The document also fails to explain how the criteria were applied to each allotment in order to reach the categorization decisions; moreover, the decisions themselves were apparently reached without prior publication of proposed decisions and opportunity for public comment, as required by the Bureau's "Final Grazing Management Policy," pp. 1-11 to 1-15 (Instruction Memorandum No. 82-292, March 5, 1982).

In part due to the lack of grazing capacity and other essential information, the discussion of environmental consequences in Table 4-1 is extremely conclusory and unhelpful.[2/] The Bureau's exclusive reliance on the table format also precludes a comprehensive, cogent discussion of how these predicted impacts were derived. While tables are useful in avoiding unnecessary repetition and reducing space and expense, they must be supplemented by more detailed explanations in order to satisfy NEPA's requirement that EISs contain evidence that the agency has conducted the necessary environmental analyses. See 40 C.F.R. §§ 1502.1, 1502.24 (1982); Department of the Interior, Departmental Manual on NEPA, § 4.14 (45 Fed. Reg. 27546 (April 23, 1980)). In particular, the EIS should explain which impacts are attributable to which particular proposed management actions.

The RMP/EIS also lacks sufficiently detailed range management proposals and a reasonable range of alternative management practices. Proposals considered in EISs must include,

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2/ In addition, some conclusions seem unlikely. It is doubtful, for example, that "increased livestock forage ... would improve overall ecological range condition." (p. 4-28.) Others are clearly wrong, such as the prediction of "gradual improvement in ecological range condition ... due to no livestock grazing" (p. 4-33) when the proposal would "authorize 168 cattle AUMs" (p. 2-36).

for each allotment, numbers of livestock, seasons of use, utilization levels, and all other necessary terms and conditions of grazing, including grazing systems. See 43 C.F.R. §§ 4120.2, 4120.2-1(a), 4120.2-3(a) (1982). Moreover, EISs must analyze a reasonable range of alternative grazing levels and a "full range of management practices." Final Grazing Management Policy, p. 1-18.

The EIS falls short of these requirements. The document analyzes a range of alternative grazing use levels for eleven management areas, but fails to specify numbers of livestock for each of the allotments within those areas. Moreover, the EIS lacks an adequate range of management practices. The only changes in seasons-of-use that are considered would lengthen the use period by thirty or sixty days on certain allotments; no reductions in existing seasons-of-use are assessed, and no explanation is offered to justify proposed increases. Similarly, proposed utilization levels are described simply as "light," "moderate," or "heavy," but these terms are never defined and their application to specific allotments is never explained or justified.

Further, existing grazing systems are not described and no specific grazing systems are proposed or even considered. (p. 2-42.) We do not object to "consultation with graziers and other interested groups" before formulating or adopting specific grazing systems, but we see no reason to delay such consultation until after the EIS has been completed or to omit proposed grazing systems from the EIS. Indeed, analyzing specific alternative grazing systems in the EIS would provide valuable information to enable the agency, the public, and graziers to develop the optimal systems.

Perhaps the most egregious example of the EIS's failure to include specific range management proposals and alternatives

relates to vegetation treatments. Virtually no information is provided with respect to the type or types of treatments that will be allowed, the specific areas that will be treated, or the need for such treatments. Instead the document baldly states that "vegetative treatments" will be applied to a certain number of acres of land. (E.g., pp. 2-16, 2-22, 2-31.)

Given that herbicide application apparently is one of the treatments under consideration (p. 4-38), this lack of specificity is a fundamental defect. Herbicide spraying may have a significant adverse effect on humans and the environment and must be thoroughly analyzed in the EIS. The potential risks must be assessed and a worst case analysis prepared and circulated for public comment when risks are uncertain. See, e.g., Save Our Ecosystems v. Watt, Civ. No. 83-6090-E (D. Ore. May 6, 1983); Merrell v. Block, Civ. No. 81-6138-E (D. Ore. April 19, 1983); Southern Oregon Citizens Against Toxic Sprays v. Watt, Civ. No. 79-1098FR (D. Ore. Sept. 9, 1982). The EIS should consider utilizing other techniques of vegetation manipulation, such as burning, as well as the possibility of "no action," or foregoing all such techniques. Without such analysis, neither the Bureau nor the public can determine how much, if any, herbicide spraying should be allowed. Moreover, because the RMP is designed to provide comprehensive guidance for all future management actions, including herbicide spraying, if any, this analysis should be included in the draft RMP/EIS, not in some later document. See, e.g., 40 C.F.R. § 1502.22 (1982).

The preferred range management plan fails to address or resolve certain acknowledged resource problems as expeditiously as possible, and should therefore be modified. The Bureau is required by FLPMA and PRIA to "take any action necessary to prevent unnecessary or undue degradation of the lands" and to "improve the conditions of the public rangelands so that they

become as productive as feasible." 43 U.S.C. §§ 1732(b), 1901(b)(2), 1903(b). In spite of this mandate, under the preferred alternative, ecological range condition "would remain static in fair and poor condition" in management area 5 (p. 4-15); no specific changes are proposed in area 7 even though the lands "would benefit greatly from more intensive grazing systems and practices" (p. 3-28); "[e]cological range condition would decline in some treated areas that are managed primarily for livestock forage" (p. vi); and continued degradation of over 5000 acres of riparian meadows in area 7 would be allowed (p. 2-23). Even the adjustments that have been identified as necessary to remedy degraded resources and improve unsatisfactory conditions would be delayed for at least five years. (pp. 1-4, 2-43.) We urge the BLM to address and resolve all identified resource problems and to implement all necessary management actions as soon as possible, as required by FLPMA and PRIA.

We have the following additional concerns and questions. In management area 11, the Bureau proposes that livestock operators have the lead in determining grazing management. (p. 2-36.) This proposal is never explained, justified, or analyzed. How much flexibility will the ranchers be given, and how much oversight will the Bureau exercise? What regulatory authority does the Bureau have to initiate such a program? Finally, why will the Bureau authorize significantly more AUMs under the "maximized protection" alternative than under the "balanced" alternative in two of the management areas? (pp. 2-10, 2-36.)

II. Fish and Wildlife

The Alturas area provides important habitat for numerous fish and wildlife species, including mule deer and antelope, and should therefore be managed to protect and improve such habitat. We commend the agency for including a number of specific

proposals that are designed to achieve this goal. On the other hand, the descriptions of wildlife habitat conditions are extremely vague (e.g., pp. 3-25, 3-26) and the threats posed to such areas are not described in any detail. As a result, the predicted environmental consequences of implementing these proposals consist of unsubstantiated conclusions, and neither the public nor the agency can assess or compare the various alternatives, in contravention of NEPA's purposes.

We support the Bureau's goal to "provide sufficient habitat for native fish and wildlife species and give emphasis to maintaining or improving certain key habitats." (p. 1-5.) However, the document fails to explain how and to what extent the specific proposed actions for fish and wildlife, taken together, will achieve this goal. Although the habitat maps are useful and detailed, they do not identify the "key" habitats; nor does the EIS explain which habitat areas are particularly important or what activities may threaten such areas. Thus, it is impossible to assess which of the proposed actions and alternatives, if any, will adequately resolve existing and potential problems.

The discussion of environmental consequences to wildlife suffers from the same flaws outlined above with respect to range management. In short, the tables provide bare conclusions with no explanation of how the conclusions were derived and no description of how terms like "moderate improvement" or "significant decline" of wildlife habitat translate into actual, on-the-ground changes. To remedy these deficiencies, the Bureau should explain the particular fish and wildlife objectives that it seeks to achieve for each management area; describe the problems and resource constraints that may impede reaching these goals; and analyze in detail how and to what extent various proposals and alternatives would resolve these problems and meet the established objectives.

III. Wilderness and ACECs

The cursory discussion of wilderness study areas (WSAs) and the complete lack of information about potential Areas of Critical Environmental Concern (ACECs) in the draft document violate the planning requirements of FLPMA and the full disclosure requirements of NEPA. The EIS contains only the sketchiest information about the two WSAs, Pit River and Tule Mountain, and provides a scant one sentence explanation for concluding that 4000 acres of the East Warners are "unsuitable" for wilderness. The bare descriptions of these areas and the brief, conclusory outline of the environmental consequences of designating the areas as non-wilderness fall far short of the basic requirements of NEPA. Moreover, the Bureau's decision to address ACECs "outside of the planning process" (p. i) violates FLPMA and the planning regulations, and the lack of any detailed discussion of the one potential ACEC mentioned, Sheep Valley, indicates that the area is not being seriously considered for such designation.

8-2

The single paragraph descriptions of the WSAs and the one page "summary tables" fail to provide the detailed information necessary for the reader to assess the proposed wilderness recommendations. The descriptions consist of broad generalizations like "deep canyon topography" together with a listing of types of vegetation and topography that purport to inform the reader of the potential wilderness values and natural features of many thousands of acres of wilderness. The summary tables consist of bare conclusions such as "no uncommon natural features," "no special ecological or geographical features" (p. 3-35), or, in the case of the recommended area, terms like "unusual scenic quality" and "abundance and diversity of native fish" (p. 3-32). Completely lacking is any detailed description of the specific natural features, landmarks, geology, flora and

8-3

fauna, mammals, reptiles, fish, etc. that exist in the WSAs, much less any meaningful analysis of how these specific resources might merit wilderness (or ACEC) designation or how they would be adversely affected by a non-wilderness recommendation. Thus, the discussion of wilderness in the EIS falls far short of satisfying NEPA's full disclosure requirements, as set forth in California v. Bergland, 483 F. Supp. 465, 484-87 (E.D. Cal. 1980), aff'd in relevant part sub nom. California v. Block, 690 F.2d 753 (9th Cir. 1982).

8-3 cont. The discussion of Tule Mountain, the area recommended for non-wilderness, is particularly disturbing. The EIS simply asserts, with no supporting descriptions, explanations, or comparisons, that the area has "no special ecological or geological features" and offers no "significant" multiple resource benefits. (p. 3-35.) The document states that similar land form types "are represented in greater quantity and quality elsewhere in the region" (id.) without describing or even mentioning such areas or explaining the criteria used to compare "quality" of the areas. Numerous endangered plants exist in the

8-4 management area (p. 3-37) but it is not clear from the discussion whether they exist in the WSA, and, if so, what the consequences to such plants of non-wilderness designation will be.

Given the absence of any detailed descriptions of the resources and recreational opportunities in the two WSAs -- and the lack of any information about the wilderness potential of the East Warners -- and the brief, conclusory section on the

8-5 environmental consequences to these areas of implementing the proposed action or any of the alternatives, it is impossible for a reader to assess the proposed action or to verify that environmental impacts have been thoroughly considered. For example, the document never explains why the 5,775 acres of the Pit River WSA recommended as non-wilderness are "extremely

8-5 cont.

difficult to manage" (p. 2-39) and never discusses possible ways for overcoming such management obstacles. Nor does it include alternatives other than "all wilderness" that would provide any protection to any portion of the WSAs other than the 5800 acres of Pit River recommended as suitable for wilderness.

The lack of detailed description or analysis, and the failure to consider additional wilderness alternatives, suggests that a final decision on wilderness proposals has already been made. If so, public comment on the proposal will not only be difficult, but also meaningless. We urge the Bureau to revise and expand the WSA discussion significantly in order to ensure that specific environmental factors are considered in the decision and that the public can participate meaningfully in the decision, as required by NEPA.

The document's treatment of ACECs is also inadequate. FLPMA requires the BLM to "give priority to the designation and protection of" ACECs in the "development and revision of land use plans." 43 U.S.C. § 1712(c)(3). The planning regulations require the agency to identify and consider "potential" ACECs in the RMP process. 43 C.F.R. §§ 1610.7-2, 1601.05(k)(1) (1983). Thus, the Bureau's decision to drop ACECs from the RMP process, and to address ACECs, if at all, "outside of the planning process" (p. i), is not only unsupported but also contrary to clear legal requirements.

The RMP/EIS does refer several times to one potential ACEC, Sheep Valley. (E.g., pp. 2-24, 4-19). However, the area is not even mentioned, let alone described, in the section on "affected environment" (pp. 3-28 to 3-29), and the resource or other values that might merit ACEC designation are never explained. Given this complete lack of information, it is impossible to assess the need or desirability of designating Sheep Valley as an ACEC, and it appears clear that the agency is not seriously contemplating

such a decision.

We urge the agency to consider potential ACECs in the RMP/EIS. In addition to expanding the discussion of Sheep Valley, the Bureau should analyze the possibility of designating the WSAs and the East Warners as ACECs as an intermediate management strategy between wilderness designation and no protection. 8-6

IV. Timber and Minerals

The RMP/EIS provides very little information about the nature, scope, or extent of existing or proposed timber and mineral activities. For this reason, it is very difficult to comment on the timber and mineral proposals in the EIS. However, it is clear that the Bureau's failure to propose any guidelines or constraints on future timber and mining activities violates the basic planning requirements of FLPMA, and its failure to describe these activities or discuss in detail their impacts violates NEPA.

The document refers to mineral exploration and development at Hayden Hill (pp. 2-32, 3-20) but never describes existing and potential activities (pp. 3-34 to 3-36) or explains the environmental impacts of such activities (p. 4-32). Instead, the EIS simply states that "present management" will continue with 'no significant impacts." Such bald assertions are obviously inadequate to comply with NEPA. Similarly, cinder pits and flat rock sales are mentioned (p. 2-25) but never described, explained, or analyzed in the other sections of the EIS, as required by NEPA.

The document also makes no attempt to propose any guidelines or constraints on future mineral activities, in spite of the acknowledged inadequacy of past land use plans for this

purpose.[3] The plan lacks any "levels of production or use," "resource condition goals and objectives," or "program constraints and general management practices" with respect to mining activities, and thus totally fails to satisfy FLPMA's basic planning requirements. See 43 C.F.R. § 1601.0-5(k)(2)-(4) (1983). In effect, existing mineral activities, as well as potential oil and gas leases (p. 3-20), are omitted entirely from the RMP.[4]

The provisions with respect to timber activities are little better. Existing management is never described except as "intensive management," and such practices are never explained or analyzed, either generally or on a site-specific basis. Environmental consequences are stated in conclusory terms like "increase in growth and vigor" without any analysis of why such results might occur if the proposals are implemented. The only alternatives relate to numbers of acres to be harvested, and some areas lack any alternatives. (E.g., pp. 2-8, 2-18, 2-24.) Nor do the proposals establish any constraints or guidelines on future timbering activities -- except for numbers of acres -- as required by FLPMA.

In short, the document's provisions with respect to minerals and timber are fundamentally inadequate. As written, the document fails to provide any information or impose any meaningful constraints on minerals or timber activities and is therefore useless for assessing or guiding these activities. We

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[3] See General Accounting Office, Minerals Management at the Department of the Interior Needs Coordination and Organization, pp. 56-57 (1981).

[4] The sole exception is one proposal to "exclude geothermal development" from important habitat areas. (p. 2-33.) Although this proposal seems desirable, it is never explained or analyzed as required by NEPA.

urge the Bureau to make a serious effort to comply with its legal obligations by drafting new sections covering these activities.

V. Land Disposal

We commend the Bureau for making land sale decisions through the land use planning process, as required by FLPMA. However, we are concerned about the large amount of land being considered for disposal. Moreover, the document fails to identify the particular criteria that will be used in making land sale decisions, to explain how such criteria apply to individual allotments, or to analyze thoroughly the environmental consequences of land sales. The EIS must therefore be revised in order to comply with NEPA.

We understand that state, district, and area managers have been pressured by the agency's Washington staff to dispose of certain amounts of public land. How much land has been slated for disposal in the Alturas area in the most recent annual work plan? In our view, generating the relatively minor revenues that will result from such sales is only justified with respect to isolated parcels lacking any significant resource, wildlife, recreational, or other public values.

The only proposed guidance for land disposal contained in the RMP is to "improve manageability of small isolated tracts of public lands." Under the "maximized protection" alternative, the Bureau would also give "full consideration to natural resource values." However, no definition of "manageability" and no examples of applicable "natural resource values" are provided. Further, the particular allotments slated for disposal are never analyzed with respect to their manageability or natural resource values. In effect, the Bureau retains virtually unfettered discretion to make land disposal decisions even though the RMP is designed to guide such decisions. Nor does the document provide adequate environmental analysis of the proposed decisions.

Additional descriptions of resources, analysis of manageability problems, and discussion of environmental impacts is clearly necessary before land sales can be made.

We are particularly concerned about the effects of land disposals on wildlife. According to the EIS, there are "potential large-scale habitat losses on deer winter range where development occurs on disposed parcels." (p. vii.) The EIS fails to justify such severe adverse impacts, however. In fact, nowhere are the benefits of disposing of such important habitat areas described. The EIS also fails to analyze the effects of the land disposals on nearby retained lands. See 43 C.F.R. § 1601.0-8 (1983). We urge the Bureau to consider these issues thoroughly, as required by NEPA, prior to making land sale decisions.

VI. Conclusion

The Alturas draft RMP/EIS reflects a substantial amount of time and effort. The results have not been insignificant: the draft contains a number of specific proposals, particularly with respect to range and wildlife management, and condenses much information into a relatively small space. At the same time, however, the draft suffers from a number of serious deficiencies, as outlined above. These shortcomings are significant and widespread enough to require the Bureau to revise and supplement the draft extensively and circulate it again for public comment. See 40 C.F.R. § 1502.9(a) (1982).

Thank you for considering these comments. Please contact me if you have any questions.

Sincerely,

David B. Edelson

David B. Edelson

Response to Letter No. 8

Response 8-1

The FEIS has been reformatted and includes additional information specific to each WSA. (See Response 5-1 for Comment letter No. 5).

Response 8-2

Areas of critical environmental concern (ACECs) were one of 18 issues initially identified in the Alturas Resource Management Plan and Environmental Impact Statement (RMP/EIS). In the analysis phase of the plan and within the context of the resource base, it was determined that the Pit River Canyon WSA and the Tule Mountain WSA did not meet the ACEC suitability criteria. Both Bureau programs, ACECs and wilderness, are two distinct and separate programs with specific yet different criteria listed for each suitability designation. The two programs do not overlap and are not an alternative for each other. Pit River Canyon and Tule Mountain were evaluated on their merits of wilderness characteristics and resources values.

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate FEIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

Response 8-3

This document has been expanded to provide more detailed information on the wilderness characteristics of Tule Mountain and Pit River Canyon WSA's. Chapter 3, Affected Environment, clearly describes for both WSA's such characteristics as naturalness, solitude, special features, and other specific resource values. In Chapter 2, the Proposed Action and alternatives for each WSA are described and discrete management actions are presented. An analysis by WSA for each Proposed Action and alternative has been provided in greater detail in Chapter 4, with summary impact tables located on pages 21, 22, and 23 for the Pit River Canyon WSA and on pages 29 and 30 for the Tule Mountain WSA.

Response 8-4

The threatened and endangered plant population of *Lomatium ravenii*, are located north and east of Termo, California, outside of the Tule Mountain WSA.

Response 8-5

The FEIS describes WSA by WSA the Proposed Action and alternatives, the specific management actions and a detail analysis of the environmental consequences based on additional specific resource information and the identification of issues through the scoping process. Information concerning manageability has been eliminated from this document and will be addressed in the Wilderness Study Report. The Proposed Actions and alternatives selected for analysis represent a range of alternatives reflecting reasonable options for management. Additional alternatives identified but dismissed from detailed analysis in the FEIS are discussed on pages 12 and 13.

Response 8-6

The concept of designating the two WSA's as ACECs as opposed to no protection was considered in the initial analysis phase of the Alturas RMP/EIS as explained in comment 8-2. (See Responses 5-1 for Comment Letter No. 5).

NORTHEAST CALIFORNIANS FOR WILDERNESS

P.O. Box 391
Susanville, CA 96130

9

July 13, 1983

District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, California 96130

Please consider the following comments on the draft Alturas Resource Area Management Plan and Environmental Impact Statement.

9-1 Your District had the opportunity to recommend for wilderness three different wilderness areas for a total of 32, 855 acres. Instead, the District chose only one-half of one area for 5775 acres. This is only 18% of the eligible area. Furthermore, even inside that small 5775 acres it appears (p. 2-26) that "business as usual" is planned: increase authorized livestock, under conditions restore suspended non-use, increase season of use in one area, allow heavy utilization in some areas, not prohibit oil and gas activities, etc. The phrase "partial wilderness designation" (p. 2-27) indeed seems to apply. The wilderness protection is very partial. This is a "balanced alternative?" It tends to confirm that wilderness is treated as an inconvenient resource to be minimized rather than a precious resource to be maximized and enhanced. Essentially, the Plan allows grazing to freely affect wilderness, while wilderness is prohibited from affecting the grazing. Perhaps this can be rethought. Specifically:

9-2 1. The Pit River Canyon wilderness should be bigger. The 5775 acres is too small. To the south are two wildernesses that are acknowledged as too small for overnight wilderness experiences: the 19,080 acre Caribou Wilderness and the 16,335 acre Thousand Lakes Wilderness. Similarly, even the original 11,575 acre Pit River Canyon WSA was "too small" to begin with. Yet BLM's response is to cut it in half to 5775 acres. From bad to worse. BLM should enhance, not diminish, its scarse wilderness resource and recommend the entire 11,575 acres as wilderness. The "buffer zone" will give valuable protection and improvement to all wilderness resources and experiences.

2. The grazing regime (p. 2-26) should be modified to maintain or decrease present livestock use, not increase it. Wilderness, watershed, recreation, wildlife, undisturbed vegetation, cultural resources, and the integrity of the envoirnment should get first priority, not grazing.

3. On the positive side, the proposals to acquire private inholdings are commendable. Efforts should be expanded, however, to acquire private land in and around the entire 11,575 acre unit, not just the 5775 acre unit.

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2. Lead Action
3. Prepare a Response
4. Review & Summary
5. Comments
6. Signature
7. File
8. Send Copy

9-3 4. Disposal study on the East Warner MA 11 parcels is a bad idea and should be terminated. Several of these agrea abut the S Warners Wilderness and clearly should remain in public hands.

In summary, wilderness is a precious non-renewable resource. With so little left, it seems that to recommend such a minimal amount, and subject it to increased grazing, does not make for a "balanced alternative." Hopefully, you will reconsider it.

Sincerely,

Carl H. Schwarzenberg

Carl Schwarzenberg, for

NORTHEAST CALIFORNIANS
FOR WILDERNESS

P. O. Box 391
Susanville, CA 96130

Response to Letter No. 9

Response 9-1

Livestock management would be governed by departmental Wilderness Management Policy which states, "It is anticipated that the numbers of livestock permitted to graze in wilderness would remain at the approximate levels existing at the time an area enters the wilderness system." Increases in livestock grazing levels would be incidental, dependent upon determinations of available forage through monitoring or improved distribution through better range management. Heavy utilization could occur in River Pasture when incorporated with the adjacent Bald Mountain Allotment into a grazing system providing rest. Increase in season of use would occur in response to delayed turnout due to weather, range readiness, etc., to provide flexibility in the grazing season. Oil and gas leasing would cease. The Bureau's Wilderness Management Policy states that upon designation the lands will be withdrawn from all forms of appropriation under the mining laws.

Response 9-2

The extent of the original WSA or roadless area as delineated in the wilderness inventory was defined by the presence of roads, railroads, and private lands. The wilderness recommendation for Pit River Canyon is now 6,640 acres. See discussion of the Proposed Action on page 10 and Map 2 on page 15 for description of boundaries of the area recommended as suitable for wilderness designation, and Chapter 3, Affected Environment, for detailed discussion of wilderness resources in Pit River Canyon WSA.

Response 9-3

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate FEIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be addressed at that time.

Sierra Club
Mother Lode Chapter
P.O. BOX 1335, SACRAMENTO, CALIFORNIA 95806

10

TO: C. Rex Cleary
Susanville BLM District
P.O. Box 1090
Susanville, CA 96130

DATE: July 14, 1983

FROM: Stanley A. Weidert
Representing Mother Lode Chapter
Sierra Club

RE: Alturas Resource Area Draft Resource Management Plan and Environmental Impact Statement

General Comments

After reading the proposed resource plan, I am forced to ask if the proposed "balanced" alternative is properly named. The main thrust of the plan seems to be directed towards outlining the procedures needed to eventually establish the maximum amount of grazing for domestic livestock while protecting a minimum level of nonconsumptive amenity resources and the current level of other consumptive resources such as timber and firewood.

The area under consideration in this plan has been significantly altered over the last 100 years with most of the alterations being done to accomodate cattle. The plan states that juniper is an invading species, which is causing loss of forage and browse for cattle and native herbaceous; however, the facts are that juniper was once a dominant natural feature of the majority of the planning area. A ranch owner has shown me pictures of his ranch near Alturas taken in the 1890's, and at that time it was well populated with western juniper. These trees were subsequently removed and the land developed for

cattle. Now the junipers are returning to those areas where they were removed. This is not an invasion of the juniper but represents the reestablishment of a species into an area where it had previously been a dominant feature, as evidenced by the 1890's photographs.

The removal of juniper and native shrubs, through burning and clearing, and past overgrazing have greatly altered the basic ecology of the resource area and aided the true invasion by imported annual grasses. This major alteration of the ecosystem, plus competition from cattle, has significantly affected the native wildlife populations. The removal of juniper has further affected those species subjected to hunting pressures by reducing cover and increasing their visibility.

The deer herds in Northeast California are the weakest in the state and much of this problem can be attributed to hunting pressure. Allowing the juniper to reestablish itself in major deer ranges could aid the deer population by providing more needed cover. Such a policy would also be the first step in allowing significant portions of the planning area to return to the original ecosystem, since the junipers and brush are the nursery plants in many instances for native bunch grasses producing eventually the climax plant community of juniper, brush, and bunch grass. For these reasons I support alternative III in the Draft Resource Plan, because it would best provide for the reestablishment of as near natural an ecosystem as is possible, and this would provide the best balance possible between competing resources. Alternative II, with its proposed grazing programs would only continue the past range manipulation practices, that have resulted in the ecosystem degradation and the resulting problems.

The draft plan does not meet NEPA requirements in that it has too few alternatives. A major problem with alternative II is that the significant costs of the proposed programs and actions

will probably not be adequately funded. A fifth alternative should have been prepared that would have addressed this possibility. Such an alternative would provide future direction for BLM employees, if adequate funds do not become available.

Another possible alternative would be one that includes portions of both alternatives II and III. Such an alternative, I feel, would be more balanced than alternative II because it would better reflect the points I have made about the natural ecosystem and could better reflect the cost limitations under current budget cuts.

Wilderness

The Mother Lode Chapter supports full wilderness for both the Pit River Canyon CA-020-103 and Tule Mountain CA-020-211 wilderness study areas. We also disagree with the removal of the East Warners area from consideration as an addition to the existing South Warner Wilderness.

East Warners

These small adjacent parcels would add to the scientific values of this wilderness by providing more lower elevation life-zone areas to the elevation transect on the east side of the Warner Mountains. These areas at any rate should not be given consideration for selling to private parties because their wilderness consideration is under litigation currently by the
10-1 Sierra Club Legal Defense Fund. When these areas were removed from wilderness consideration by Secretary Watt we were told that this did not mean that they would be proposed for surplus lands sales but would be kept in the public domain because of their already determined significant values, that were demonstrated by their being considered for wilderness designation. How is it that these parcels can be even considered for sale so soon after

this statement? In addition to the wilderness values the draft plan recognizes that the sale of three of these parcels may have significant impact on the sensitive plant Galium glabrascens ssp. modocense. Since this plant is also recognized in the plan as being used by cattle for food this impact is almost a certainty because of the loss of protection such sales would guarantee. This proposed sale goes totally contrary to the stated goal on page I-5 of "Provide habitats to maintain and enhance the populations of threatened, endangered, and sensitive plants." We, the Mother Lode Chapter, strongly protest this disregard for the scientific and wilderness values of the Fast Warner Wilderness Study Area.

Tule Mountain

We feel that this Wilderness Study Area would provide an excellent area for studying the natural succession pattern discussed earlier. It would also provide a good opportunity for studying a remnant white fir population that is mentioned in the text.

Pit River Canyon

10-2 While we are glad to see the recommendation for wilderness for the canyon portion of the Wilderness Study Area, we feel that small size jeopardizes the wilderness values of the canyon and that the reasons for deletion of portions of the summit are inadequate. The existing stock improvements are only small ponds that do not significantly impact the wilderness quality of these areas. In fact, I personally stood at two of them on July 4, 1982, and still felt that I was experiencing a sense of wilderness. None of the ways can be considered roads by the BLM definition and provide good hiking paths that don't cause further environmental impacts. Also, these roads would easily be fenced off to eliminate vehicular intrusions. Such an approach and larger wilderness would provide for better protection for the

raptor aeries and other wildlife values. For these reasons the Mother Lode Chapter, Sierra Club supports a maximum wilderness for the Pit River Canyon.

SMSA's

All wilderness analysis for these three areas should be reevaluated with regards to their service areas. The Redding area was given full SMSA recognition by the Federal Government in January, 1983, because the population of the areas immediately surrounding Redding when combined with its current 45,000 population within the city limits results in more than the 50,000
10-3 requirement. Since Redding is recognized as the service area for Shasta, Siskiyou, and Trinity Counties, the 100,000 service population requirement is easily met. At any rate since Congress is due to review BLM wilderness after 1988, the SMSA analysis should be considered based on the fact that Redding will be a service area at that time. Consideration should also be given for the Medford area which should reach SMSA status before 1990.

I hope these comments will be of value to you in your development of a Final Resource Management Plan for the Alturas Resource Area. Please keep me informed about your progress in these matters. If you have any questions, feel free to contact me.

Sincerely,

Stanley A. Weidert

Stanley A. Weidert
Inwood, Rt. 2, Box 175
Shingletown, CA 96088
(916) 474-3679
Member: Mother Lode Chapter
Executive Committee
Chairman: Shasta Group, MLC

Response to Letter No. 10

Response 10-1

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate FEIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

Response 10-2

In the FEIS, the Proposed Action for the Pit River Canyon has been expanded to include an additional 860 acres with boundaries defined by watershed divisions and other topographic features. See page 10 for a description of the Proposed Action (Partial Wilderness). Map 2 on page 15 shows the Proposed Action and the boundary of the area recommended as suitable for wilderness designation.

Response 10-3

Discussion of SMSAs has been eliminated from the FEIS and will be included in the Wilderness Study Report. The Redding area in Northern California will be acknowledged in the Wilderness Study Report.

SUSANVILLE DISTRICT
JUL 13 1983

11

ACTION	ROUTING & INITIAL	
		DIST MGR
		ASST DM
		SEC'T
		PLS & ENV
		PIO
		RESOURCE
		ADMIN
		OPER
		EAGLE LAKE OFFICE
		ALTURAS OFFICE
		CEDARVILLE OFFICE

1. Information
2. Lead Action
3. Provide Input
4. Review & Surname
5. Comments
6. See me
7. File
8. Send Copy

THE WILDERNESS SOCIETY

FOUNDED IN 1935

July 8, 1983

Mr. C. Rex Cleary
Susanville BLM District
PO Box 1090
Susanville, CA 96130

Dear Mr. Cleary,

The Draft Resource Management Plan and Environmental Impact Statement for the Alturas Resource Area is seriously flawed in several ways. In general, we are concerned that the thrust of the evaluation and the proposed alternative is not equitable, but rather gives precedence to timber, grazing, and multiple use development over conservation of resources. Specifically, we wish to object to several provisions in the proposed alternative II.

The alternative recommended in the report would eliminate the East Warners WSA as non-suitable for further wilderness consideration. This recommendation has been made even though the parcels are contiguous to the South Warner Wilderness, contain sensitive plant species, and complete an ecological wilderness unit. We strongly object to the loss of this WSA, and support wilderness designation for all the parcels.

The Tule Mountain WSA is also completely eliminated in the proposed alternative. We believe this large WSA is important, due to its proximity to two large population centers and its natural values, and strongly object to the WSA being recommended as non-suitable for wilderness.

11-1

The Pit River WSA is a prime wilderness candidate, and we are deeply concerned that the proposed alternative advocates eliminating 5,775 acres of the canyon from wilderness consideration -- particularly since nearly 4,000 acres has already been dropped from the 1978 inventory recommendation. Not only does this WSA amply satisfy FLPMA requirements that wilderness areas be accessable to significant population centers, but the river and canyon provide important habitat for raptors and wildlife, offer excellent recreation, and contain archeological sites. Half of the Pit River Canyon area is being recommended for wilderness designation in alternative II; it is illogical and environmentally unsound not to recognize the integrity of the entire Canyon ecosystem as a protected wilderness area.

Alternative II does not provide complete and enforceable protection of archeological sites, endangered plants, raptor nesting habitat, and riparian areas threatened by mining, logging, and fuel-gathering. Increased grazing time and allotments may threaten riparian and land quality, and fencing and water impoundments required by the proposed alternative will be costly for the tax-payer.

11-2

278 POST STREET, #400, SAN FRANCISCO, CA 94108
(415) 982-~~2973~~ 2795

We support alternative III, maximum protection, and strongly urge more balance between the need for vigorous protection of fragile and irreplaceable wilderness lands and the demands of development and multiple use.

Sincerely,

Patricia Hedge

Patricia Hedge
Regional Director, California-Nevada

Response to Letter No. 11

Response 11-1

In the FEIS, the selection of the Proposed Action and the development of alternatives including alternatives considered but dropped from further analysis is described on pages 9-3 for both the Pit River Canyon WSA and the Tule Mountain WSA. Additional specific information on the resource values within each WSA has been included in Chapter 3 to provide a more complete description of the WSA. The Wilderness Study Report will provide specific rationale for the Bureau's recommendation, including manageability diversity within the National Wilderness Preservation System, geographic distribution of wilderness areas and availability of wilderness to Standard Metropolitan Statistical Areas.

Response 11-2

In the FEIS, resource values identified as issues as well as the wilderness values including special features are assessed in Chapter 4 Environmental Consequences based on the management actions identified for the Proposed Action and alternatives for each WSA. While mitigation measures established in this document are not complete in terms of full protection, the assessment of impacts on resource values does identify mitigation measures to minimize impacts resulting from the management actions. These management actions represent a reasonable pattern of activities based on planning projections that could occur within the WSAs. Prior to actual implementation of any surface-disturbing activities, a site-specific assessment would be completed that would identify specific mitigation measures and stipulations.

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

July 13, 1983

Mr. C. Rex Cleary
District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, California 96130

RE: Draft Alturas RMP and EIS

Dear Mr. Cleary:

Atlantic Richfield Company appreciates having the opportunity to provide comments to the Bureau of Land Management (BLM) regarding the draft Resource Management Plan (RMP) for the Alturas Resource Area, Lassen and Modoc Counties, California.

12-1 We concur in the Bureau's preliminary recommendation that the Tule Mountain and East Warners areas are nonsuitable for wilderness designation because of manageability problems and their potential for oil and gas development. Because locations within the planning area harbor potential for the occurrence of several industrial and metallic minerals, it is important that such lands remain open to all mineral appropriation. In addition, Pit River Canyon may have oil/gas potential. This portion of northeastern California is presently under study by our Company to locate areas of Cretaceous marine sedimentation which have been covered with volcanics ranging in age from Miocene to Recent. The BLM should make certain that its case-by-case use of permanent and seasonal plant and wildlife stipulations does not effectively preclude resource development. Such BLM action will help ensure future accessibility and utilization of the area's energy and mineral resources.

Thank you for the opportunity to provide these comments.

Sincerely,

Jay R. Mitchell

J.R. Mitchell

JRM:JFO:drm

Response to Letter No. 12

Response 12-1

While Tule Mountain WSA does contain oil and gas leases on 1,600 acres, the potential for discovery or production of oil and gas resources is considered very low. The Proposed Action (No Wilderness/No Action) for the Tule Mountain WSA would permit oil and gas exploration and development. However, based on the very low potential no exploration or development activity is anticipated.

For the Pit River Canyon WSA, a preliminary study by U.S. Bureau of Mines did not reveal any potential mineral resources, including oil and gas.

A combined U.S. Geological Survey/U.S. Bureau of Mines Mineral Report will be prepared for WSAs recommended as suitable for wilderness designation to further define mineral potentials. This information will be considered in the Bureau's final wilderness recommendations. Since the Proposed Action for the Pit River Canyon is Partial Wilderness a USGS/BM Mineral Report will be prepared.

July 12, 1983

Bureau of Land Managment
Alturas, Ca.

Attention: Richard Drehobl

Dear Mr. Drehobl,

We, Dahle Bros., are land owners owning land in the middle of the proposed Pit River Canyon Wilderness Area.

13-1 The North wilderness boundry should run from the South West corner of our property in Section 3 to the South West boundary of the wilderness area in 4, including a strip approximately 3/8 mile wide from center line of Pit River on the North rim. This line could follow elevations and other land marks wherever possible. This will allow access to our land in Muck Valley for agricultural operations and minimize visual impact between agriculture and wilderness along the whole North boundary.

With our interest in land in Section 3, 34, and 27, we are prepared to grant easements for access to the proposed Wilderness Area.

13-2 We are interested in trading our land located in Section 9 and 16 in the Pit River Canyon WSA for other BLM lands in the Muck Valley area which would be beneficial to our holdings in Muck Valley. We do not wish to initiate such a trade or grant easements until the issue of establishing the boundary of the suitable wilderness area is resolved by Congress.

We do not want to be land-locked by the Wilderness Area and therefore suggest the wilderness boundary not be further North than the Southern extent of the private land in Section 3.

132 Sincerely,

Gary Dahle

Dahle Bros.,
By Gary Dahle

Response to Letter No. 13

Response 13-1

Your comments have been considered. Refer to page 10 for a description of the Proposed Action (Partial Wilderness) for the Pit River Canyon WSA. Map 2 on page 15 shows the Proposed Action with the boundary of the area recommended as suitable for wilderness designation. The area recommended as suitable for wilderness designation has been expanded to 6,640 acres, with boundaries following watershed divisions and other topographic features.

Response 13-2

We look forward to working on a possible exchange to acquire lands within the WSA boundary, as identified in the Alturas RMP/EIS, and the possibility of access across your property to the wilderness boundary following final Congressional approval of the proposed wilderness designation.

June 28, 1983

14

29900 Highway 20
Fort Bragg, California 95437

Mr. C. Rex Cleary
District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, California 96130

Public Hearing Record

Alturas Resource Area Management Plan

Dear Mr. Cleary:

Thank you for the copy of the Alturas Resource Area Draft Resource Management Plan and Environmental Impact Statement which I recently received. I have carefully reviewed this document and have these comments for the public response record:

My concerns with the proposed management plan lie primarily in two areas - Inadequate wilderness designation, and the unsuitability of the BLM preferred alternative for management purposes.

First of all, the BLM preferred alternative for the Alturas does not protect public lands, and the public purse, from continued overgrazing and use of public monies for range improvements that benefit only private interests. Critical natural areas are not protected with ACEC designations. Archeological sites, raptor nesting habitat, riparian zones, and endangered plants are inadequately protected from logging, mining, fuelwood cutting, and grazing. Approximately 22,600 acres of public land is inventoried for potential sale, including important grazing land and critical natural areas.

I frankly see no way that the BLM preferred alternative can be modified to meet the most minimal requirements for sound land management. I recommend abandonment of the present preferred alternative, and adoption of Alternative III, which would protect all 28,525 acres of roadless land in the three study areas, provide for resource recovery from present overgrazing, AND WHICH WOULD provide maximum protection for riparian areas, archeological sites, and endangered plant and wildlife species from resource exploitation.

The second major problem with the Draft Management Plan is inadequate wilderness designation. The Pit River Study Area survives with less than half of its original
14-1 acreage recommended for wilderness. The 4,000-acre South Warner Contiguous areas are completely deleted for reasons which are not at all clear, and proposed for sale. The 16,950-acre Tule Mountain WSA is declared non-suitable for cause even more obscure.

BLM should recommend wilderness status for all of the Pit River, South Warner Contiguous, and Tule Mountain Wilderness Study Areas. This action, together with recommendation of Alternative III, should provide the sound, balanced land management that the Alturas Resource Area so richly deserves.

Please keep me informed of progress towards sound land use planning for the Alturas.

Sincerely,

Ron Guenther

Response to Letter No. 14

Response 14-1

The Proposed Action (Partial Wilderness) for the Pit River Canyon WSA has been expanded to include 6,640 acres of public lands utilizing watershed divisions and topographic features as boundaries. Chapter 3, Affected Environment, has also been expanded to provide more information on the wilderness characteristics of each WSA. (See Response 11-1 for Comment Letter No. 11.)

The East Warners Contiguous area (CA-020-708) will be analyzed in a separate EIS which will be prepared in 1987. Comments regarding this Section 202 Wilderness Study Area will be considered at that time.

MEC

MINERALS
EXPLORATION
COALITION

Minerals Advocate
In Public Policy

12640 West Cedar Drive
P.O. Box 15638
Denver, Colorado 80215
303/989-5567

July 14, 1983

C. Rex Cleary
District Manager
Bureau of Land Management
P.O. Box 1090
Susanville, CA 96130

Dear Sir:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Draft Resource Management Plan and Environmental Impact Statement for the Alturas Resource Area. The MEC is a coalition of exploration companies and individuals conducting exploration on federal lands.

15-1 In view of the fact that wilderness areas designated after December 31, 1983, will be withdrawn from appropriation under the mining and leasing laws, we believe that all areas with mineral and energy potential should be excluded from wilderness designation, even though no economic deposit is now known. The withdrawal limitations will preclude the collection of new data, and new areas of mineral potential will not be found. With new discoveries effectively stopped, the policy of excluding all currently known mineral potential from wilderness should be followed, so that exploration of these areas will not be restricted and minerals might yet be produced. Explorationists tend to look at the long term because the lead time of discovery may be ten to fifteen years. The impact of wilderness on minerals should be assessed over the long term (a century or more). We believe that land use decisions should be in conformity with the policy statements made in the National Minerals Program Plan and Report to Congress released by the President in April, 1982.

BOARD OF DIRECTORS

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Lakewood, Colorado

*Eliseo Gonzalez-Urien**
Lakewood, Colorado

*W. Glen Zinn**
Englewood, Colorado

**Executive Committee member*

MEC believes the Preferred Alternative (Alternative II, Balanced) adequately recognizes the mineral potential of the area and provides access and flexibility of administration for multiple use management.

The Minerals Exploration Coalition thanks you for the opportunity to comment on this draft resource management plan and environmental impact statement.

Sincerely,

John D. Wells

John D. Wells
President
MINERALS EXPLORATION COALITION

JDW/th

Response to Letter No. 15

Response 15-1

A variety of resource values, including mineral potential, are considered in regards to recommendations for wilderness suitability. As you noted, the Preferred Alternative (Alternative II, Balanced) in the RMP/EIS which includes the Proposed Actions for the Pit River Canyon WSA (Partial Wilderness) and Tule Mountain WSA (No Wilderness/No Action) does recognize the mineral potential for the WSAs which is considered to be low to very low. See Chapter 3, Affected Environment, in the FEIS and Response 12-1 for Comment Letter No. 12 for additional information on minerals.

PACIFIC GAS AND ELECTRIC COMPANY

PG&E 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. W. PAGE
MANAGER
LAND DEPARTMENT

July 12, 1983

Bureau of Land Management
Draft Alturas RMP/EIS
File: 025.35

Richard Drehobl
Area Manager
Alturas Resource Area
Bureau of Land Management
P. O. Box 771
Alturas, California 96101

Dear Mr. Drehobl:

Pacific Gas and Electric Company has reviewed the draft Resource Management Plan for the Alturas Resource Area and offers the following response.

A portion of one of the corridors we are examining in the Trans-Sierra Intertie Feasibility Study may overlap the proposed Pit River Canyon Wilderness Area in the vicinity of Little Valley. We are aware of the proposed Wilderness Area and will address it in our corridor study. At this stage, however, we cannot determine whether we will need to or be able to make any adjustments.

16-1 Any area which is more extensive than what is indicated by the hatched area of Map 3-5 could foreclose our options to use this corridor. This corridor could be needed in the future to meet California's energy needs. We therefore encourage the Bureau of Land Management to designate it as a planning corridor for future transmission use. On the attached map we have shown the portion of this study corridor which is in the vicinity of the proposed Wilderness Area.

16-2 On the attached map we have also delineated an existing 3-phase 12 kV distribution line which serves the community of Little Valley. Portions of this line appear to be within the proposed Wilderness Area. Our concerns regarding the operation of this line revolve around its continued existence in the present location, proposed limitations on vehicular access within 200 yards of raptor nest sites from April 1 to July 15, and proposed restriction or prohibition of off-highway vehicle use within the Wilderness Area. These restrictions could cause problems in patrolling, maintaining or rebuilding our existing facilities, particularly in emergency situations.

If you would like additional information on either the transmission study corridor or the existing distribution line, please call Ms. Melody Kercheval at (415) 541-5687.

Sincerely,

MRKercheval:sa

Response to Letter No. 16

Response 16-1

The corridor mentioned was identified in the early phases of the Trans-Sierra Intertie Feasibility Study. However, through the scoping of the alternatives identified at the outset of the study this corridor was found to be in potential conflict with the WSA and rerouted further south to eliminate any potential conflicts as identified in the Northern California Corridor Study, Pacific Gas and Electric Co., May 1984.

Subsequently, the proponent has identified another one of the eight planning corridors under study as their preferred alternative.

Response 16-2

The 12-kV distribution line mentioned does not fall within the area recommended as suitable for wilderness designation under the Proposed Action (Partial Wilderness) for the Pit River Canyon WSA.

720 Washoe
Susanville CA 96130 17

July 13, 1983

District Manager Rex Cleary
Area Manager Richard Drehobl
BLM
P.O. Box 1090
Susanville

PROPOSED ALTURAS RMP AND DEIS

Dear Gentlemen:

Thank you for this opportunity to comment. I incorporate by reference my oral comments at the May 23 wilderness hearing, in favor of a Pit River Canyon Wilderness and in favor of retaining the S. Warner Wilderness Contiguous WSA.

According to DEIS p. 1-1, much of the planning area has sub-standard range conditions, and "wildlife habitat such as riparian and meadow areas are being degraded." FLPMA and PRIA require that BLM improve unsatisfactory range conditions. The public supports this. Yet there are few specifics in the DEIS to show how BLM will improve conditions. Rather, the plan frequently calls for more grazing pressure.

Each new EIS the Susanville District issues seems to stray farther from the NRDC v. Morton judgment. I appreciate the difficulty in preparing the first Resource Management Plan, and combining it with a grazing EIS. There are several very good features; a concise document; clear, concise writing; very well structured, clear tables such as 2-1 and 4-1, which are easily compared; good clear maps in chapter 3. Also good is the disclosure of numbers of livestock and of AUM's; of utilization levels; and sometimes of specific season of use. The DEIS does, however, lack some key information needed to help the job of improving the public range lands; it lacks a level of specificity; it lacks a detailed monitoring plan; and it shows a consistent bias toward livestock grazing at the expense of other resources. Thirdly, the proposed action slashes a tiny Pit River Canyon WSA (11,575 acres) into a much tinier proposed wilderness (5775 acres), which would apparently be the smallest Federal wilderness outside of New Hampshire and offshore islands. This was done to avoid "difficulty to manage," yet making such a tiny wilderness creates new management problems.

Below are constructive comments.

Pit River Canyon

Pit River Canyon is the most remarkable feature in this resource area. In the context of BLM's RMP planning process, therefore, I first recommend an 11,575 acre Pit River Canyon Wilderness.

Secondly, because of its outstandingly remarkable values (scenic, wildlife, recreation, historic, prehistoric, etc.), I nominate the Pit River corridor through BLM lands as a Wild and Scenic River segment. This certainly seems
17-1 to meet the criteria for a Wild River.

Thirdly, I nominate the Pit River Canyon WSA as an Area of Critical Environmental Concern (ACEC). Because of its environmental significance it meets the BLM criteria for identification of Relevance, Importance and Special Significance. It matches BLM's "Illustrative Examples""(Guidelines for ACEC's, August 1980) of (1) Cultural Value, (2) Scenic Value, (3) Fish or Wildlife Resource, and (4) Natural Systems. This is consistent with FLPMA, which states in Section 202(c)(3):

> In the development and revision of land use plans, the Secretary shall ...., (3) give priority to the designation and protection of areas of critical environmental concern.

This Alturas RMP is the development of a land use plan. Until a final decision, I suggest Pit River Canyon be managed as a proposed ACEC, as well as protected as a wilderness study area.

Specific Comments

17-2 p. i Why was each of the four issues dropped? How and when will they be addressed? What happened to the five or so other resources that are scarcely mentioned in the DEIS -- recreation, wetland/riparian, socioeconomics, minerals/energy, soil and water, etc? Is BLM saying soil and water is insignificant in most MA's?

p. ii - x Notice the summary impacts resulting from the proposed action:

- o 37 allotments out of production after land disposal.
- o Potential large-scale habitat losses if disposed parcels developed.
- o Moderate loss of timber resources and revenues after land disposal.
- o Slight degradation of cultural values.
- o Loss of sensitive plant populations in case of land disposal.
- o Slight to moderate adverse impacts on undesignated WSA's.
- o Significant adverse impacts on four permittees from land disposal.

Clearly, these impacts are cumulatively significant. Mitigation measures listed later do not mitigate these. Notice that five of these effects would be avoided if the land disposal measure were eliminated from the proposed action. Clearly, the land disposal is a bad idea, and I would suggest it be dropped. Two other adverse effects would be lessened by maintaining or reducing present grazing levels, which I also suggest.

p. 2-2 Footnote. What is planned to start collecting such missing data as this on AUM's for wildlife, watershed, and riparian? A basic information need.

p. 2-4 Is it cost-effective to intensively manage only a 57 acre unit? Would the small patch of timber be more valuable left standing as old growth wildlife habitat and recreation area? Same question applies to other MA's with similar timber patches. What cost-benefit research has been done?

p. 2-5 How does selling these public parcels improve BLM's "manageability" of them? Why not instead have "Same as Alternative III"? The same question applies in all other MA's with this proposed disposal study.

p. 2-6 (RANGE) This is typical of a recurring objection I have throughout the MA's. The 5113 new AUM's would more than double present use. What are the data justifying this? Specifics are absent. The monitoring "system" shown (p. 2-44 and 45) is a sketchy outline and inspires no confidence that it can "determine" when this big increase should occur.

Why allow a 30+ day increase? Which 30 days? This illustrates the recurring problem of allowing increased grazing with "floating" seasons of use. Pin down to specific dates, so the public can know what is going on.

Why allow "heavy utilization"? Another recurring objection I have throughout the MA's. For good range management, shouldn't it be limited to moderate?

Similar objections to the above also on p. 2-13, 2-16, 2-22, 2-26, 2-31, etc.

p. 2-17 I suggest you move the fourth, fifth, and seventh measures to the proposed action. These special wildlife species need and deserve more protection. Also consider protecting future and potential nest trees. The present ones are going to die some day and recruit nest trees (and pilot trees) are needed.

p. 2-23 (WATERSHED) This protects only 350 acres, less than 10% of the degrading acreage. I suggest you replace this with Alternative III.

more

p. 2-24 I suggest moving the Support Needs of III to II and the preferred alternative to protect the small, sensitive area. (WATERSHED)

p. 2-26 RANGE I strenuously object to the proposed authorizing of more AUM's, more suspended non-use, more season of use, and heavy utilization, all within or near the WSA of Pit River Canyon. I believe grazing should not be increased in the WSA or the wilderness. Other multiple values take precedence; watershed, wildlife, botanical, recreation, aesthetic, cultural. I support the Archaeological District designation for Pit River; however, increasing grazing would be counter-productive. BLM's idea of multiple use may be backpacking beside a herd of cows; but mine is not. To maintain wilderness values at today's level grazing should not be increased; to enhance them, it should be decreased.

p. 2-26 WILDERNESS I would suggest terminating existing ways outside the edges of the wilderness to keep out ORV intrusions; however, I would support continued motorized access for the two permittees to maintain range improvements in their allotments.

17-3 P. 2-26 Footnote There is no allotment map. The EIS information is not site-specific. I could not tell where each allotment was in relation to the WSA, so one cannot tell where grazing increases would occur. Thus the impacts are not linked to the ground, which is the whole idea of an EIS. I would like to know specific effects of grazing on the WSA.

p. 2-27 Suggest moving the second and sixth measures from Alternative III to II and the preferred alternative.

17-4 p. 2-28 Suggest replace the small 200 acres with the needed 1300 acres.

17-5 p. 2-28 A section on MINERALS/ENERGY seems very appropriate but missing here (see p. 2-38 bottom).

p. 2-29 "Allow flexibility in season of use..." is vague . BLM should have enough data to establish an initial season of use. If necessary to change later, then it can be done within the planning process by a plan amendment. This also applies to other MA"s where season of use is open-ended.

p. 2-31 RANGE Again I disagree with allowing additional livestock and heavy utilization. I suggest existing use and moderate utilization.

p. 2-33 MINERALS Why no similar provisions for protection from oil and gas? I support both.

p. 2-34 I approve of designating sensitive plant locations "as a Research Natural Area", or Areas if appropriate, along with the other protective measures. However, what about annual monitoring? Also, nothing is proposed to specifically protect the endangered plant in the Termo Lane and Coffin Allotments. Why? I suggest this also be made an RNA and/or exclusion area from cattle and OHV's. The same questions and suggestion also applies to the Hayden Hill plant.

p. 2-36 RANGE I object to "livestock operators have the lead in determining grazing management." That is BLM's responsibility, to lead the grazing management of our public lands. Not to follow. I disagree with the deregulation of grazing management.

p. 2-37 T & E PLANTS The monitoring is good, but what is being done to protect the two sensitive species?

p. 2-37 LANDS I strongly oppose disposing of these WSA parcels. During the previous Administration they were eligible additions to the S. Warner Wilderness, which is where they still belong. Privatizing them may have adverse impacts on the Wilderness itself, lying immediately adjacent. They should remain public.

p. 2-38 The last sentences seem to consider it an advantage that "only 5800 acres of public lands" will be withdrawn from mineral entry, leaving 98 percent of the planning area open to mineral entry. It could also be pointed out that with a full Pit River Canyon Wilderness, only 11,575 acres would be withdrawn, leaving 95 percent open. Not significantly different. And:

p. 2-39 Conversely, the approximate 100 percent increase in the size of the wilderness from 5800 to 11,575 acres would have significant wilderness benefits. These benefits should override BLM's perceived disadvantage of it being "difficult to manage" -- which is questioned above.

p. 2-39 As stated, I do not believe the rationales are valid for excluding half of the Pit River Canyon WSA from wilderness, and the S. Warner Wilderness Contiguous WSA from wilderness suitability.

p. 2-42 and Chapter 4 One of the main objections is that unlike previous Susanville EIS's, this one does not give any grazing systems. What is happening to the public land -- year-long grazing? Deferred grazing? Rest-rotation grazing? "Livestock operators have the lead?" Given that lack of grazing system data, how can you predict the environmental consequences? Are the Chapter 4 effects the effects of grazing systems you have not developed yet? Then what is their liklihood of occuring? I would like to see grazing systems in this EIS, not deferred to the AMP's.

p. 2-43 Specifically (not generally) how will the infamous M-I-C prioritisation system be implemented in this plan? How will it work in the resource area? How do you decide priorities across M-I-C classes, for example are the I allotment water facilities done before or after the M allotment monitoring, or AMP? More specifics are needed.

p. 2-44 This 2-page monitoring outline is inadequate for the resources and the RMP. First, how will you monitor the implementation of the RMP itself as opposed to the AMP's? How will you know whether the RMP's objectives are met? Secondly, what are the specifics: monitoring frequency, units of measure, tolerances, and actions if objectives are not achieved?

p. 2-45 In the seventh sentence, why not add "threatened" species in case some are later listed?

p. 4-1 through 4-26, Chapter 4 The list of significant adverse environmental impacts is very extensive. Their cumulative effect is a significant deterioration of our public lands and resources. This is in my opinion unacceptable. The preferred alternative should be reshaped or replaced with Alternative III to minimize the following unacceptable impacts:

p. 4-4 CULTURAL
p. 4-7 FUELWOOD
p. 4-8 CULTURAL
p. 4-10 FISH & WILDLIFE
p. 4-10 CULTURAL
p. 4-11 FUELWOOD
p. 4-13 FISH & WILDLIFE
p. 4-13 FUELWOOD
p. 4-15 RANGE
p. 4-15 FISH & WILDLIFE
p. 4-16 CULTURAL
p. 4-18 TIMBER
p. 4-21 CULTURAL
p. 4-27 T & E PLANTS
p. 4-31 CULTURAL
p. 4-34 T & E PLANTS

p. 4-37 MITIGATION MEASURES These mitigation measures will be "considered" (third sentence). Yes, but what ones will be implemented? When? Where? Specifics are again needed.

R-3 "U.S. Department of Interior" seems to be missing from the references.

Other Comments

o The preferred alternative is difficult to track in the document; it does not appear at all in Table 2-1 or 4-1.

o Just as there are no grazing systems in the EIS, there are also no silvicultural systems. How are you going to harvest trees? How are you going to regenerate the land? Are you going to thin? How much old growth are you leaving? Where? What rotation age? What is "intensive management"? What is the demand for the timber? Is the timber program cost-effective? Why harvest at all? What is the assurance that marginal sites will not be logged? Why aren't these basic questions answered?

o What is the period for which the plan is intended?

o What is the next step in the planning process? What, in fact, are the steps?

o What are the needs and plans for new data collection?

o What are procedures for updating, amending, or revising the plan?

17-6 o Finally, you have already received many comments on your proposed Pit River Canyon Wilderness. In your Susanville District files are dozens of letters responding to the WSA inventory that called for a larger Pit River Canyon Wilderness. They cite many study phase factors in support of wilderness, which BLM said it would consider during the study phase. Have these dozens of pro-wilderness comments been read and considered by your planners? If not, I now incorporate them by reference, including my 1979 and 1980 letters, into these comments.

Thank you for considering this and other public input in formulating your FEIS and Resource Management Plan. I certainly hope it shows more specifics, less bias toward grazing, and the full-sized Pit River Canyon Wilderness that that beautiful area deserves.

Sincerely, Curtis Spalding

Curtis Spalding

Dept. of Interior
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JUL 15 1983
BUREAU OF LAND MANAGEMENT
SUSANVILLE, CALIFORNIA

Response to Letter No. 17

Response 17-1

The Pit River has been inventoried by the National Park Service as part of the National Rivers inventory. As part of this inventory the Pit River Canyon through BLM public lands was noted for its scenic qualities. However, based on conversations with the Western Regional Office of the National Park Service, the river is not considered as a candidate for the National Wild and Scenic Rivers System. Furthermore, the State of California has not nominated the Pit River for the State Wild and Scenic River System. Designation of the Pit River as part of the National Wild and Scenic River System is an action that would be independent of other land use designations and is not seen by the BLM as an alternative to wilderness. At this time the Bureau is not intending to nominate the Pit River for inclusion in the National Wild and Scenic River System.

An alternative that would designate the Pit River Canyon WSA as an Area of Critical Environmental Concern (ACEC) was considered but dismissed from further analysis. Though the WSA does contain a variety of resource values these resources do not appear to be jeopardized under current management. Therefore, special management attention is not considered to be required to protect and prevent irreparable damage. Additionally, ACEC designation was not considered as a substitute designation for wilderness. (See page 12 for Alternatives Considered But Dropped From Further Analysis.)

Until Congress establishes a final decision on whether a WSA is to be designated wilderness or not, the WSA will be managed under the BLM's Interim Management Policy.

Response 17-2

In Chapter 1 of the FEIS, issues for each WSA are identified that are to be analyzed in the document. Additionally, issues considered but not determined to be significant for detailed analysis are discussed. (See "Identification of Issues" pages 5-9.)

Response 17-3

In the FEIS, the locations of grazing allotments as well as existing and proposed livestock improvements are identified on Map 6 for the Pit River Canyon WSA and Map 7 for the Tule Mountain WSA. For each WSA, livestock grazing management actions are identified for each alternative in Chapter 2 and the impacts of these management actions on the wilderness values within each WSA are assessed in Chapter 4.

Response 17-4

Under the Proposed Action (Partial Wilderness) for the Pit River Canyon WSA, 740 acres of private land have been identified for acquisition under the land tenure management actions in Chapter 2.

Response 17-5

In the FEIS a description of the mineral/energy resources has been added to Chapter 3, Affected Environment (see page 35 for the Pit River Canyon WSA and page 41 for the Tule Mountain WSA). The mineral potential in both WSAs is described as low to very low as indicated by preliminary inventories. Consequently, no mineral/energy development actions are projected for either WSA in Chapter 2.

Response 17-6

All public comments concerning the inventory phase were acknowledged at the time of the Final Intensive Inventory, and have been considered in the development of the Proposed Action and alternatives for each WSA identified in this FEIS as well as during the scoping process to identify issues for analysis in this document.

10 July 1983

18

BUREAU OF LAND MANAGMENT
Susanville District - Alturas Resource Area

As landowners bordering the Pit River Canyon W.S.A., we request the final northern wilderness boundary be at the north rim of the Pit River Canyon. We feel a non-wilderness buffer between the canyon rim and private land (Breeding Field, Sec. 11, Collett Lake, Sec. 12, Middle Lake, Sec. 7, Muck Valley, Sec. 32 and 33.) will serve the interests of both areas.

We request the upstream wilderness boundary not be further north than the private land on Section 3. This will prevent land-locking (by wilderness) the private land in Section 27, 34, and 3.

18-1

We request the downstream wilderness boundary not be further north than the mouth of the canyon in Section 4. The circular elevation line is north of the mouth at the canyon. Beyond this point is a gravity irrigation system serving private land in Section 10.

We feel these boundaries will consolidate agricultural activities around the private lands and seperate wilderness activities to Pit River Canyon.

18-2

We are interested in granting access to the wilderness area through our land in Section 27 and 34, however, it would not be in our best interest to grant this access until the boundary of the Pit River Wilderness reflecting the above requests is approved by Congress.

Yours truly,

Thomas J. Vestal
June B. Vestal

Thomas J. Vestal
June B. Vestal

Response to Letter No. 18

Response 18-1

Your comments have been considered. Refer to page 10 for a description of the Proposed Action (Partial Wilderness) for the Pit River Canyon WSA. Map 2 on page 15 shows the Proposed Action with the boundary of the area recommended as suitable for wilderness designation. The area recommended as suitable for wilderness designation has been expanded to 6,640 acres, with boundaries following watershed divisions and other topographic features.

Response 18-2

We look forward to working on access into the Pit River Canyon following final Congressional approval of the proposed wilderness designation.

List of Preparers

LIST OF PREPARERS

PRIMARY PREPARERS

Name:	Larry Teeter
EIS Position:	Team Leader
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EIS Position:	Wilderness Coordinator
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Glossary

GLOSSARY

ANIMAL UNIT MONTH (AUM): The amount of forage required to sustain the equivalent of one cow or five sheep for one month.

CONTIGUOUS: Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

FLPMA: The Federal Land Policy and Management Act of 1976 (Public Law 94-579, 90 Stat. 2743.43 USC 1701).

IMPACT: The effect, influence, alteration, or imprint of an activity.

IMPAIR: To diminish in value or excellence.

LIVESTOCK GRAZING OPERATIONS: Those operations under permit where the primary purpose is the grazing of livestock for the production of food and fiber. Includes pack and saddle stock used in conjunction with such operations.

MANAGEMENT FRAMEWORK PLAN (MFP): Land-use plan for public lands that provides a set of goals, objectives, and constraints for a specific planning unit to guide the development of detailed plans for the management of each resource.

MINERAL ENTRY: The right to enter the Public Lands (under the administration of the BLM) to search for minerals and to claim or lease such minerals under the mining and mineral leasing laws and regulations.

MOTORIZED EQUIPMENT: Any machine activated by nonliving power source except small battery-powered, handcarried devices such as flashlights, shavers, Geiger counters, and cameras. Also "Mechanized Equipment."

MOTOR VEHICLE: The present and potential uses of the various resources administered through multiple use management on the public lands and any public values associated with such uses.

MULTIPLE USE: "...the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural, scenic, scientific, and historical values; and harmonious and coordinated management of the

various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (From Section 103, FLPMA.)

NATURALNESS: Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From section 2(c), Wilderness Action).

OFF-ROAD VEHICLE (ORV): Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other terrain.

OUTSTANDING: 1. Standing out among others of its kind; conspicuous; prominent. 2. Superior to others of its kind; distinguished; excellent.

PLANNING AREA: The area for which resource management plans are prepared and maintained. In most instances, it is the same as the resource area, which is a geographic portion of the BLM district, under supervision of an area manager.

PLANNING CRITERIA: The factors used to guide development of the resource management plan, or revision, to ensure that it is tailored to the issues previously identified and to ensure that unnecessary data collection and analyses are avoided. Planning criteria are developed to guide the collection and use of inventory data and information, the analysis of the management situation, the design and formulation of alternatives, the estimation of the effects of alternatives, the evaluation of alternatives, and the selection of the preferred alternative.

POPULATION CENTER: A Standard Metropolitan Statistical Area (SMSA) which has a population of 100,000 or greater. An SMSA is a county which contains at least one city of 50,000 inhabitants or more plus as many adjacent counties as are metropolitan in character and are socially integrated with that central city or cities.

PRE-FLPMA: Before October 21, 1976, the date of approval of the Federal Land Policy and Management Act.

PRELIMINARY WILDERNESS RECOMMENDATION: Refers to a wilderness recommendation at any stage prior to the time when the Secretary of the Interior reports his recommendation to the President. Until the Secretary acts, the recommendation is "preliminary" because it is subject to change during administrative review.

PRIMITIVE AND UNCONFINED RECREATION: Non-motorized and undeveloped types of outdoor recreation activities.

PUBLIC LANDS: For the purpose of the wilderness review program, any lands and interest in lands owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquired ownership, except:

1. Lands where the United States owns the minerals but the surface is privately owned.

2. Lands being held for the benefit of Indian, Aleuts, and Eskimos.

3. Lands tentatively approved for State selection in Alaska.

4. Lands on the Outer Continental Shelf.

5. Oregon and California grant (O&C) lands that are managed for commercial timber production.

RANGELAND IMPROVEMENTS: Any structural or nonstructural improvements which directly affect or support the use of the forage resource by domestic livestock, such as fences, line cabins, water lines, and stock tanks.

RESOURCE MANAGEMENT PLAN (RMP): The basic decision document of BLM's resource management planning process, used to establish allocation and coordination among uses for the various resources within a Resource Area. An RMP is a "land-use plan" prescribed by Section 202 of the Federal Land Policy and Management Act. RMP regulations appear in 43 CFR 1601. (Refer to definition of Management Framework Plan).

SMSA: Standard Metropolitan Statistical Area - See definition under "Population Center."

SOLITUDE: 1. The state of being alone or remote from habitations; isolation. 2. A lonely, unfrequented, or secluded place.

SUBSTANTIALLY UNNOTICEABLE: Refers to something that either is so insignificant as to be only a very minor feature of the overall area or is not distinctly recognizable by the average visitor as being man-made or man-caused because of age, weathering, or biological change. An example of the first would be a few minor dams or abandoned mine buildings that are widely scattered over a large area, so that they are an inconspicuous part of the scene. Serious intrusions of this kind, or many of them, may preclude inclusion of the land in a wilderness study area. An example of the second would be an old juniper control project that has grown up to a natural appearance, the old fallen trees largely decomposed.

SUITABILITY: As used in the Wilderness Act and in the Federal Land Policy and Management Act, refers to a recommendation by the Secretary of the Interior or the Secretary of Agriculture that certain Federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.

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Appendix

IN REPLY REFER TO:

8500
CA-930.1

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

MAY 6 1986

Mr. Gail Kobetich, Project Leader
U.S. Fish and Wildlife Service
Sacramento Endangered Species Office
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Kobetich:

The U.S. Bureau of Land Management in California is preparing eleven final Wilderness EIS's during fiscal year 1986 that will analyze the environmental impacts of wilderness designation or non-designation on a total of 58 Wilderness Study Areas (WSA's). We hereby initiate informal consultation pursuant to Section 7 of the Endangered Species Act concerning this matter.

Some of these WSA's provide important habitat for federally listed or proposed endangered species (for example, Peregrine Falcons and Bald Eagles). It has been determined by the BLM that the designation or non-designation of these areas as wilderness by Congress (at the recommendation of the BLM) will have only incidental benefit to any threatened or endangered species involved, not significant positive or negative effects.

We seek your concurrence that these wilderness designations or non-designations do not themselves require formal Section 7 consultation, but that such consultation must be initiated prior to on-the-ground implementation of activities which may affect threatened or endangered species under wilderness or non-wilderness designations.

Your prompt reply will be greatly appreciated.

Sincerely,

Ed Hastey
State Director

United States Department of the Interior
FISH AND WILDLIFE SERVICE
SACRAMENTO ENDANGERED SPECIES OFFICE
2800 Cottage Way, Room E-1823
Sacramento, California 95825-1846

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May 9, 1986

MEMORANDUM

TO: Mr. Ed Hastey, State Director, Bureau of Land Management, California State Office, 2800 Cottage Way Sacramento, California 95825

FROM: Project Leader, Endangered Species Office, Sacramento, California 95825

SUBJECT: Consultation requirements for BLM Wilderness Designation 8500 (CA-930.1) (Case No. 1-1-86-I-321)

In response to your May 6, 1986, request for informal consultation regarding designation or non-designation of wilderness status for Wilderness Study Areas (WSA's), we concur with your statement that this process does not require formal Section 7 consultation. Any future actions on WSA's that might affect a listed species can be evaluated at proposal stage and formal consultations initiated if needed.

If you have questions regarding this reply please contact me at FTS/460-4866.

Gail C. Kobetich

cc: Chief, Endangered Species, Portland, OR 97232 (AFA-SE)

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